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July 29, 2019

**Via Electronic Mail: [bmcbroom@c3gov.com](mailto:bmcbroom@c3gov.com)**

City of Commerce City  
Attn: Brian McBroom, City Manager  
7887 E. 60<sup>th</sup> Avenue  
Commerce City, CO 80022

Re: Regional Operator Agreement

Mr. McBroom:

Please allow this letter to serve as our request that the City Council of Commerce City stay any vote on the Regional Operator Agreement (“ROA”) with Extraction Oil and Gas, LLC. It is absolutely premature to engage in any Agreement with this operator prior to the completion of rulemaking through the Colorado Oil and Gas Conservation Commission (the “Commission”) and its analysis involving the cumulative impacts of the oil and gas industry on Colorado.

As you are aware, the Colorado General Assembly passed SB 19-181, which was signed by Governor Jared Polis on April 16, 2019. SB 19-181 is considered a sea change in regulating oil and gas operations in the state. The state of Colorado and every local government must “regulate the development and production of the natural resources of oil and gas in the state of Colorado **in a manner that protects** public health, safety, and welfare, including protection of the environment and wildlife resources.” § 34-60-102(1)(a)(I). There is no balancing test. In fact, the state has imposed a floor on local governments when regulating oil and gas operations. § 34-60-131. Municipal government do not have the authority to go below the floor and there is certainly no language in the legislation that would authorize a local government to waive its obligation to protect its residents, the environment, and wildlife resources.

As there is a floor of protection, the Commission has been given the authority to adopt rules involving, among other things:

1. Alternative location analysis process;
2. Evaluate and address the potential cumulative impacts of oil and gas development;

3. Financial assurances of oil and gas operators; and
4. Proper wellbore integrity.

§ 34-60-106(11)(c)I)-(II), (13) and (18). A review of the proposed ROA fails to contemplate the Commission's rulemaking and wholly fails to address cumulative impacts of oil and gas operations. In fact, how could the ROA contemplate such things when the state has not completed its rulemaking and analysis?

Next, it must be asked why Commerce City would engage in an ROA with this particular operator? It is no secret that Extraction has been involved in several accidents throughout the Front Range. An example involves the explosion in Windsor, Colorado.

<https://www.westword.com/news/windsor-explosion-report-provides-no-new-answers-from-extraction-oil-and-gas-10064153>. Another accident involved a massive release of gas that resulted in the health department being notified of an "air quality matter."

<https://www.thedenverchannel.com/news/local-news/state-finds-issue-at-extraction-drill-site-near-erie-notified-health-dept-for-air-quality-matter->. Just a few months ago, Extraction was levied a fine of \$803,800 for failure to perform pressure testing on wells.

<https://www.cpr.org/2019/06/04/regulators-slapped-colorado-oil-and-gas-companies-with-5-million-in-penalties-last-year/>.

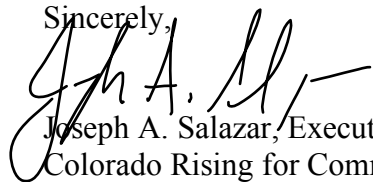
As a result of the abusive practices of this industry, municipalities across the Front Range have implemented moratoria in their jurisdictions in order to protect their residents. At least eight (8) Front Range local governments have implemented moratoria, including municipal governments in oil and gas friendly counties. <https://www.greeleytribune.com/news/7th-colorado-community-approves-moratorium-on-new-oil-and-gas-development/>. By considering this ROA, Commerce City appears poised to reject the experiences of these local governments that have dealt with this and other operators.

Moreover, it is absolutely astonishing that Commerce City is contemplating waiving its legal rights and local control authority. SB 19-181 gives local governments the ability to protect their residents from abusive and irresponsible oil and gas operators. Local governments, including Commerce City, readily show up to the state Capitol every year seeking more authority from the state. Now that such authority is provided to local governments, the first decision you are considering is to relinquish that authority in favor of an oil and gas operator? Such consideration is a slap in the face to every Commerce City resident and raises serious concerns about the integrity of this ROA deal making.

We ask that Commerce City halt this ROA process until the Commission has completed rulemaking and the cumulative impacts analysis. Even at first blush, this ROA fails to meet the floor of protection found in SB 19-181. Should Commerce City continue with the grossly irresponsible process, and should it attempt to ratify the ROA with a vote of City Council, I imagine Commerce City residents will engage in whatever legal action is necessary to protect themselves from this operator, and to protect themselves and their rights from being bargained away by their City Council.

Mr. McBroom, I am happy to discuss our concerns with you. In the interim, should you have any questions or comments, I can be reached at (303) 895-7044. Thank you for your time and attention in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe A. Salazar", with a long horizontal stroke extending to the right.

Joseph A. Salazar, Executive Director  
Colorado Rising for Communities

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July 29, 2019

**Re: Draft Regional Operator Agreement with Extraction Oil and Gas**

Dear Mayor Ford and Councilmembers Davis, Douglas, Frank, Guardiola, Huseman, Husrt, Madera, and Teter,

Please accept these comments submitted jointly by Earthjustice, the League of Oil and Gas Impacted Coloradans (LOGIC), and North Range Concerned Citizens (NRCC) (collectively, Community Groups) on the draft Regional Operator Agreement (ROA) between Commerce City and Extraction Oil and Gas. Thank you for providing the opportunity for written public comment on the draft ROA. For the reasons explained below, Commerce City should not finalize the ROA, which reflects an outdated approach that does not provide adequate protections for public health, safety, welfare, the environment, and wildlife. Instead, Commerce City should take a brief pause and develop new regulations applicable to all future oil and gas development in Commerce City that provide sufficient health and environmental protections, taking into account the cumulative impacts of past, present, and reasonably foreseeable future oil and gas development in and near Commerce City.

**I. To Adequately Protect Public Health, Safety, Welfare, and the Environment, Commerce City Must Adopt a Moratorium to Update Its Regulations, Rather than Lock in an Outdated Operator Agreement.**

Commerce City's draft Regional Operator Agreement ("ROA") fails to take advantage of the new statutory landscape that substantially broadens local government authority to protect public health, safety, welfare, and the environment from the adverse impacts of oil and gas development.

Continuing to use the now-outdated ROA model after the passage Senate Bill 19-181 ("SB181") is fundamentally inconsistent with the City's stated goal of "ensur[ing] a number of significant health, safety and general welfare protections that are not currently required under city regulations." See Commerce City, *Frequently Asked questions: Draft Regional Operator Agreement with Extraction Oil & Gas* (last visited July 26, 2019), <https://www.c3gov.com/home/showdocument?id=8044> ("ROA"). If the City's goal is truly to provide additional protections for public health and the environment beyond those currently provided by the City's regulations, there is a much better solution. The City can simply update its regulations to provide the additional protections. Prior to the passage of SB181, this may have posed legal challenges for the City. There were questions about whether local regulations that provided stronger protections than state regulations would be preempted by the state regulations. See, e.g., *City of Fort Collins v. Colo. Oil & Gas Conservation Comm'n*, 369 P.3d 586, 593 (Colo. 2016); *City of Longmont v. Colo. Oil & Gas Ass'n*, 369 P.3d 573, 584–85 (Colo. 2016); Order Granting in Part



& Denying in Part Plfs.’ Mot. for Partial Summ. J., Slip Op. at 7, *Colo. Oil & Gas Ass’n v. City of Thornton*, No. 2017 CV 31640 (Adams Cty. Dist. Ct. Apr. 24, 2018). As a result, many local jurisdictions entered into operator agreements with oil and gas operators to secure commitments to best management practices beyond what state law required. The ROA clearly fits into this outdated model. Its plain language states that the “Agreement is meant to provide protections and requirements where an OGP meets or exceeds the requirements in the Applicable Code and in COGCC regulations.” ROA at Article 4.2 (page 4).

But SB181 eliminated this preemption framework and the need for operator agreements as workarounds for the ordinary regulatory process. SB181 was co-sponsored by Commerce City’s elected state officials—Senator Dominick Moreno and Representatives Adrienne Benavidez and Dafna Michaelson-Jenet. *See* Colo. General Assembly, *SB 19-181: Protect Public Welfare Oil and Gas Operations* (last updated Apr. 16, 2019), <https://leg.colorado.gov/bills/sb19-181> (click “sponsors” tab). SB181 fundamentally alters the powers of local governments to adopt regulatory protections for public health, safety, welfare, the environment, and wildlife that are stronger than the applicable state requirements. SB181 establishes that local governments have the authority to “[r]egulat[e] the surface impacts of oil and gas operations in a reasonable manner . . . to protect and minimize adverse impacts to public health, safety, and welfare and the environment.” Colo. Rev. Stat. § 29-20-104(1)(h). The statute provides a lengthy list of subject matters that are appropriate for local government regulation, including land use, facility siting, financial securities, and air quality. *Id.* § 29-20-104(1)(h)(I), (II), (IV), (V), (VI). The statute explicitly authorizes local governments to inspect oil and gas operators and to impose fine and fees on oil and gas operators. *Id.* § 29-20-104(2)(a)–(c).

Most importantly, SB181 clarifies that state regulation is no longer a barrier to local regulation. *See, e.g., id.* § 34-60-105(1)(b)(V) (explaining that the COGCC’s statutory authority does not “alter[], impair[], or negate[] the authority of . . . a local government to regulate oil and gas operations pursuant to section 29-20-104”). In a statutory section entitled “no land use preemption,” SB181 makes clear that “local governments and state agencies, including the [COGCC] and [other] agencies . . . have regulatory authority over oil and gas development, including as specified in section 34-60-105(1)(b). A local government’s regulations may be more protective or stricter than state requirements.” *Id.* § 34-60-131 (emphasis added).

Because there is no longer any legal question that Commerce City can adopt regulations stronger than state standards, there is no reason for the City to follow the now-outdated model of negotiating an operator agreement with provisions stronger than state rules. Commerce City can, and should, develop its own regulations that provide as strong of protections as it believes are necessary and reasonable to protect public health and environment. Limiting the City to those practices that Extraction is willing to agree to almost certainly will provide weaker protections than any regulations that the City might choose to adopt on its own. In a post-SB181 world, there is no justification to limit municipal standards for the oil and gas sector to those that operators will agree to in a contract. Oil and gas, like every other industry, can now be subject to regulatory requirements that it does not agree to explicitly, even if they are stricter than state law.

Moreover, the specific draft ROA at issue has numerous disadvantages that will lock Commerce City into outdated standards without the ability to adapt to future situations that may require stronger regulatory protections for public health and the environment. For example, any facilities permitted under the ROA—and even facilities that Extraction has simply submitted a permit application for—will remain subject to the provisions of the ROA even if the ROA is terminated. ROA at Article II (page 2). More alarmingly, Commerce City essentially forfeits its right to deny municipal permits for every facility covered by the ROA, even if the City later realizes that stronger protections are necessary. *See* ROA at Article 6.2 (pp. 9–10). And Commerce City explicitly forfeits its right to protest, or even request a hearing, on every state level permit issued for a facility covered by the ROA, and similarly forfeits its right to object to or request hearings on facilities “outside the City’s jurisdiction.” ROA at Article 9.1 (p. 11). This is a significant waiver of the City’s ordinary rights to participate in state permitting processes that impact the City.

The only flexibility built into the ROA is a limited provision allowing the City to propose the use of new technologies that will have additional benefits for public health and the environment. But the ROA creates a burdensome process in which Extraction can essentially veto the City’s proposal simply by stating in writing that it “will not employ the proposed technology.” ROA at Article 7.2 (pp. 10–11).

It is nonsensical for Commerce City to voluntarily lock itself in to an outdated framework during a time of significant regulatory changes at the state level. For the first time ever, local governments have clear authority to adopt stronger regulations on their own. Regulatory proceedings before the COGCC and Air Quality Control Commission (“AQCC”), and in other local jurisdictions throughout the state will almost certainly uncover practices that improve upon the BMPs in the ROA. Commerce City needs the flexibility to consider these rapidly unfolding regulatory proceedings and to determine whether it wants to follow other jurisdictions in adopting stronger health and environmental protections. Moreover, the regulatory landscape at the state level will almost certainly be very different just a year from now, after July 2020, when SB181 requires COGCC to complete numerous state-level rulemakings. By acting hastily to commit to BMPs amidst this changing landscape, Commerce City is forfeiting an opportunity to better protect the health of its residents and its natural resources.

Rather than committing to potentially outdated BMPs based on a system designed as a workaround to a now-extinct statutory preemption framework, Commerce City should instead do follow other local governments’ lead adopt a temporary moratorium until the City can update its oil and gas regulations. Jurisdictions across the state have done exactly this. *See, e.g.,* Hayley Sanchez, *Adams County Commissioner Says Oil And Gas Moratorium Is A ‘Timeout’*, Colo. Pub. Radio (Mar. 21, 2019), <https://www.cpr.org/2019/03/21/adams-county-commissioner-says-oil-and-gas-moratorium-is-a-timeout/>; *see also* Trevor Reid, *7th Colorado Community Approves Moratorium on New Oil and Gas Development*, Greeley Tribune (May 29, 2019), <https://www.greeleytribune.com/news/7th-colorado-community-approves-moratorium-on-new-oil-and-gas-development/> (listing jurisdictions that have adopted moratoria to reassess their regulations, including Broomfield, Erie, Superior, Lafayette, Berthoud, Timnath, and Adams County). Time is necessary to develop regulations that provide strong protections for public health and the environment—but do not require contractual negotiations with operators.

Moreover, many local jurisdictions recognize the value in taking a pause to allow the regulatory proceedings at the COGCC and AQCC to play out. This will clarify what the state regulatory “floor” will be, and of provide a forum to vet standards that can provide even stronger health and environmental protections.

Accordingly, Commerce City should not finalize the draft ROA. Instead, the City should exercise its newfound authority under SB181 and adopt a temporary moratorium that provides City staff with the time they need to develop broadly-applicable regulations that provide stronger protections for public health, safety, welfare, the environment, and wildlife.

## **II. Commerce City Must Retain, not Waive, Its Legal Authority to Deny Specific Permit Applications that Are Inconsistent with Protecting Public Health, Safety, Welfare, and the Environment.**

As discussed above, the draft ROA effectively eliminates Commerce City’s ability to deny permits to any of the 190 wells proposed for the eight sites listed in Exhibit A. *See* ROA at Article 6.2 (pp. 9–10); ROA at Article 9.1 (p. 11). But another major change enacted by the passage of SB181 is that local governments now clearly have the authority to *deny* permits if they believe doing so is necessary to protect public health, safety, welfare, the environment, and wildlife. This is embodied in the statutory provisions discussed above that give local governments standard land use powers over oil and gas development. These allow the governments to deny permits where they are inconsistent with an area’s zoning, character, planned future development. *See, e.g.*, Colo. Rev. Stat. § 29-20-104(1)(h)(I). And inherent in a local government’s authority to “regulate” oil and gas development to protect public health, safety, welfare, and the environment is the authority to deny permits if a location is incompatible with adequately protecting these resources. *See, e.g., id.* §§ 34-60-105(1)(b)(V), 34-60-131.

Moreover, SB181 changed the definition of “waste,” to clarify that “waste” “does not include the nonproduction of oil or gas from a formation if necessary to protect public health, safety, and welfare, the environment, or wildlife resources.” *Id.* § 34-60-103(11)(b), 12(b), 13(b). Thus, if the City denies a permit because a proposed location is inconsistent with protecting public health and the environment, temporarily preventing an operator from accessing its mineral rights, it would not constitute “waste.” This weakens the operator’s (already limited) possibility of prevailing in a regulatory takings lawsuit.

The ROA’s framework commits the City to approving permits for all of the contemplated sites, and even forfeits the City’s right to oppose or request hearings on state permits. This is incompatible with the City’s ability to deny permits under SB181. Accordingly, the City should not approve the ROA. Instead, it should adopt new regulations that specifically recognize the City’s legal authority to approve, deny, or condition all oil and gas permits on a case-by-case basis, based on the specific public health and environmental impacts of the facility at issue.

## **III. The ROA Fails to Take Cumulative Impacts Into Account.**

The ROA is a Regional Operator Agreement. It covers eight separate wellpads, which collectively will include up to 190 wells. ROA at Exhibit A. This is on top of additional wells

that are likely to be drilled at other sites in and near Commerce City by Extraction and other operators over the course of the next few years. And there are already numerous other existing wells in and around Commerce City. *See, e.g.*, ROA at Exhibit D.

Nowhere does the ROA take into account the cumulative impact of these wells. Under federal law, a “[c]umulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions. . . . Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” 40 C.F.R. § 1508.7. This is particularly true in the oil and gas context. Although any given well may have relatively minor air quality, traffic, dust, noise, light, water quality, and wildlife impacts, a large number of facilities all impacting the same area can collectively have a much greater impact.

For example, the proposed Falcon, Owl, and Blue Jay wellpads are located close together. The local roads will be impacted by the truck traffic necessary to construct, drill, complete, fracture, and maintain all 54 wells that will be drilled at these three sites—not just the 18 wells at each pad. Similarly, the Falcon, Owl, Blue Jay, Pelican and Condor pads are all located along an approximately two mile stretch of the E-470 corridor, which will substantially increase traffic on the road network in this area. There is already a great deal of conflict between wildlife and other land uses in this area, and the cumulative impacts of dozens of new oil and gas wells and the associated construction infrastructure will exacerbate this conflict. Similarly, the Harlo and Jacobson pads are directly adjacent to one another, which will collectively increase traffic on Highway 2 and Peoria Street, impact new housing and the Bison Ridge Recreation Center, and potentially have cumulative impacts on the First Creek watershed that is nearly adjacent to both well pads.

SB 181 recognizes the importance of taking into account cumulative impacts. *See Colo. Rev. Stat. § 34-60-106(11)(c)(II)*. The ROA is regional in nature, underscoring the benefit of resource planning (and taking into account cumulative impacts) at a regional scale. Yet the ROA does nothing to consider how all 190 wells contemplated by the ROA will collectively impact Commerce City. Indeed, the ROA exempts Extraction from submitting a comprehensive drilling plan—the one tool that might allow the City to consider cumulative impacts. *See ROA at Article 5.5*.

Rather than approve 190 wells without considering how they will cumulatively impact Commerce City’s air, roads, and waterways, the City should instead adopt regulations that require considering each project’s cumulative impacts prior to issuing a permit. Additionally, Commerce City should develop a city-wide plan that addresses the cumulative impacts of past, present, and reasonably foreseeable future development within and close to Commerce City’s boundaries. Only by understanding what a project’s cumulative impacts will be on already-stretched resources can the City be in the position to determine whether any given project may be the proverbial straw that breaks the camel’s back.

#### **IV. Commerce City Should Protect Public Health By Mandating Best Management Practices Through Regulations, Instead of the ROA’s Loophole-Ridden Approach that Allows Extraction to Avoid Complying with Many Standards at Its Discretion.**

Perhaps the best example of why the draft ROA is less protective of public health, safety, welfare and the environment than a regulatory approach is that Extraction is afforded substantial discretion to effectively ignore many of the best management practices (“BMPs”). The ROA makes compliance with the BMPs mandatory. ROA at Article 7.1. But the devil is in the details. The BMPs are riddled with requirements that allow Extraction to comply only if “practicable.” Indeed, there are ten “practicable” exceptions in the air quality BMPs alone. *See* ROA at Exhibit B § 1(A)(iii), (xii), (xiii), (xiv), (xv), D(v), H, I. In turn, the ROA defines “maximum extent practicable” and “practicable” in a manner that allows Extraction almost total discretion to avoid complying with these provisions. ROA at Article 14.7. The ROA provides that if Extraction “wishes to be excused from a condition” with a “practicable” exception, it need only state in writing that the requisite technology poses an “[un]reasonable cost,” that it would face “undue operational . . . hardship,” or that it would create an “unnecessary economic hardship” to comply. ROA at Article 14.7(a)(, c).

Thus, if Extraction decides it costs too much comply with any BMP with a practicability exception, it can easily avoid doing so. Commerce City staff can make a determination about whether any given practicability claim is valid. *Id.* at 14.7. But in practice, it will be challenging for the City to understand any given technical issues—and Extraction’s finances—to determine if a BMP truly poses an “undue economic hardship.” This is a glaring loophole that transforms the BMPs from meaningful protections for health and safety into an aspirational list of goals.

Under SB181, it is entirely unnecessary for local governments to agree to this kind of loophole. Commerce City is not constrained to negotiating with Extraction about optional BMPs that the company will agree to. If the City believes that the public health and environmental protections embodied in the BMPs are indeed reasonable and necessary, it can (and should) instead adopt them as fully enforceable regulations.

#### **V. The ROA Unnecessarily Forecloses Commerce City from Considering Alternative Sites for the Proposed Wellpads.**

Another reason that the ROA provides weaker public health, safety, welfare, and environmental protections than a regulatory approach is that it forecloses the City from conducting a thorough consideration of potential alternative sites. In fact, the ROA locks Commerce City into agreeing to the eight sites in question through 2024. *See* ROA at Article 2. Even if circumstances change, and the areas surrounding the sites change over the course of the next five years as new housing developments are built or other oil and gas wells are drilled, the ROA forces the City to remain committed to these sites.

The ROA’s only requirement for considering alternatives is for sites that are not in agricultural, industrial, or Planned Unit Development zones where oil and gas is a permitted use. ROA at Article 5.5(z) (page 9). But all eight of the sites are in Planned Unit Development zones,

so this is meaningless. See City of Commerce City, *Property Information* (last visited July 27, 2019), <https://maps.c3gov.com/propertyLookup/>.

Identifying which sites are most appropriate for development in a manner that best protects public health, safety, welfare, and the environment while minimizing adverse impacts is a fundamental component of local government land use power. The ROA functionally forecloses the use of those powers for the eight sites in question. Especially at a time that Commerce City is rapidly changing and growing, the City should not commit to specific sites for 190 high-impact industrial activities, foreclosing the City's ability to later consider alternative sites that are more compatible land uses as circumstances change.

## **VI. Commerce City Must Raise Inspection and Monitoring Fees to Fully Cover Costs.**

The ROA charges astonishingly low annual inspection fees (\$500 per new well), and equally inadequate annual air quality monitoring costs (\$250 per new well). ROA at Article 13.3 & 13.4 (page 14). Assuming Extraction drills all 190 wells contemplated by the ROA, this is equal to *at most* \$95,000 in annual inspection fees and \$47,500 in annual air sampling fees.

This will not cover the costs of the staff time, equipment, and overhead expenses for inspecting 190 wells per year. Rather than cap the inspection fees at such a low level, Commerce City should follow Aurora's approach of requiring operators to cover the full cost of inspections, without capping the dollar value of that reimbursement. See City of Aurora, *Oil & Gas Operator Agreement* § 20.1 (p. 10) (June 5, 2019), [https://www.auroragov.org/UserFiles/Servers/Server\\_1881137/File/Residents/Oil%20and%20Gas%20Drilling/ConocoPhillips%20Oil%20and%20Gas%20Operator%20Agreement%20FINAL.pdf](https://www.auroragov.org/UserFiles/Servers/Server_1881137/File/Residents/Oil%20and%20Gas%20Drilling/ConocoPhillips%20Oil%20and%20Gas%20Operator%20Agreement%20FINAL.pdf).

Similarly, Broomfield's experience with air monitoring for Extraction's facilities demonstrates that the \$250/well/year air sampling fee is too low. Broomfield's operator agreement requires Extraction to pay Broomfield \$20,000 per year to cover air quality sampling. City & Cty. of Broomfield Resolution No. 2017-186, *Amended and Restated oil and Gas Operator Agreement* at Exhibit B § 20(C)(2) (Oct. 24, 2017), <https://www.broomfield.org/DocumentCenter/View/25064/Resolution-2017-186-and-Agreement?bidId=>. But in fact, Broomfield will incur up to \$2.3 million to cover its air quality sampling program for Extraction wellpads in the city. Jennifer Rios, *City Contracts with CSU, Private Firm for Air Quality Testing*, Broomfield Enterprise (Aug. 29, 2018), <https://www.broomfieldenterprise.com/2018/08/29/city-contracts-with-csu-private-firm-for-air-quality-testing/>. Because Broomfield is spending up to \$2.3 million to cover air quality sampling from six Extraction wellpads that include up to 84 wells, it is very likely that Commerce City will thus incur even higher costs to obtain adequate air samples from eight Extraction wellpads with 190 wells throughout the city.

Instead of approving the ROA and forcing Commerce City taxpayers to pay for inspecting Extraction's facilities, the city should instead adopt regulations requiring all oil and gas operators to fully cover inspection and air quality monitoring costs. This blanket regulatory approach once again has significant advantages over the ROA, which locks the City in to far too low inspection and monitoring fees for the foreseeable future.

**VII. The Financial Assurance Clause Leaves Commerce City Subject to Potentially Millions of Dollars of Financial Risk.**

The ROA only requires Extraction to provide a \$3,000,000 bond or credit letter. ROA at Article 12.3. This is an exceptionally low amount to cover the potential remediation costs of up to 190 wells and eight well pads, should Extraction enter bankruptcy proceedings. The oil and gas industry has notoriously precarious finances, subject to rapid swings due to the price of crude oil, which is determined in the international marketplace. An oil price bust caused by unpredictable market forces could quickly send Extraction into bankruptcy, leaving the City with only \$3,000,000 to cover costs associated with remediating Extraction's well sites. There is no justification for the City to expose itself to this unnecessary financial risk. At the very least, Commerce City should require a higher bond. Better yet, the City should take a pause, study the issue, and develop city-wide regulations establishing a uniform, and sufficiently high, bonding level for all oil and gas facilities.

Sincerely,

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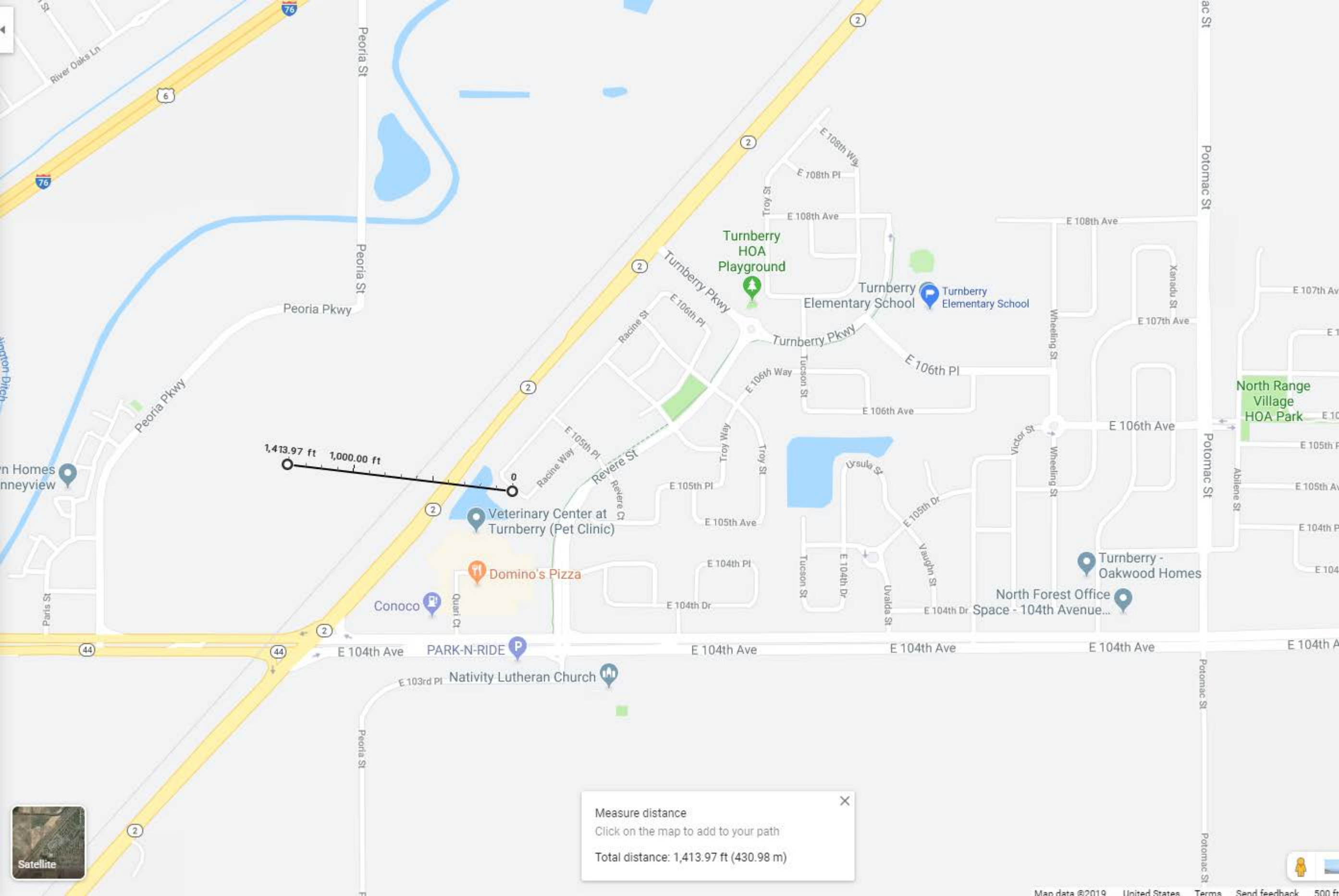
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# Why 'Orphan' Oil And Gas Wells Are A Growing Problem For States

Unplugged wells can leak explosive gas into neighborhoods and leach toxins into groundwater.

07/09/2018 10:53 am ET | **Updated** Jul 09, 2018



ERIC GAY/THE ASSOCIATED PRESS

Cattle graze around an idle pump jack on a South Texas ranch. State agencies that regulate the oil and gas industry are stepping up their efforts to plug abandoned and "orphan" oil and gas wells.



Why 'Orphan' Oil And Gas Wells Are A Growing Pr...



By Sophie Quinton

When Bill West drives his weed sprayer over wheat and hay fields at his ranch northwest of Gillette, Wyoming, he occasionally bumps into debris from the more than a hundred defunct natural gas wells on his 10,000-acre property.

The company that owned the wells went out of business four years ago, leaving behind fuse boxes, internet boxes and thousands of feet of underground pipe.

“They just walked away and left everything sitting,” said West, 85. “It’s up to the state to take care of it now.”

So-called “orphan” oil and gas wells, which have been abandoned by defunct companies that cannot pay to plug them, are a growing problem in many states thanks to a recent slump in energy prices that has forced marginal operators out of business.

Adam Peltz, a senior attorney at the Environmental Defense Fund, said he heard officials from 10 states highlight their work on orphan wells at a spring meeting of the Interstate Oil and Gas Compact Commission. “It’s probably the issue that was raised by the most number of states.”

Peltz said that dealing with orphan wells is a cyclical issue — more wells become the state’s responsibility after a downturn — but it’s getting worse over time, as states struggle with a backlog of wells that dates back decades.

Nobody knows how many orphan and abandoned drilling sites litter farms, forests and backyards nationwide. The U.S. Environmental Protection Agency estimates there are more than a million of them. Unplugged wells can leak methane, an explosive gas, into neighborhoods and leach toxins into groundwater.

Methane leaking from abandoned wells caused explosions at a Colorado construction site in 2007 and at a Pennsylvania home in 2011.

In 2014, an Ohio elementary school had to be evacuated because of a gas leak traced to an abandoned well underneath the gym. Near the West Texas town of Imperial, effluence from decades-old oil wells has created a “lake” of salty, sulfurous water.





as the coalbed methane wells on Bill West's ranch in Wyoming, to tens of thousands for deeper, more complicated projects.

In recent years, state legislatures and oil and gas regulators have increased funding for well cleanup by appropriating more money and increasing bonding requirements. They also have tried to make it harder for companies to walk away from their wells, such as by intervening earlier to prod companies to reactivate or plug wells that are sitting idle.

Wyoming's oil and gas commission has been plugging 350 to 400 wells a year for the past four years — compared to a dozen or two in previous years. It has about 3,600 to go. Some of the over 30,000 active drilling sites across the state could one day join the list.

Assuming it costs about \$5,000 to plug each orphan well, the state could be facing a bill of \$18 million.

"If you ask me what keeps me up at night, it's that all these wells have to get plugged," said Mark Watson, Wyoming's oil and gas supervisor.





COURTESY OF THE PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

A 1920s-era steel drilling rig at the Drake Well Museum in Titusville, Pennsylvania. Oil and gas drilling in Pennsylvania dates to the 19th century, as do many orphan wells in the state.

## Learning From Past Mistakes

Bill West said he and his wife, Marjorie, were happy some two decades ago to give a Michigan-based company permission to drill for coalbed methane on their land. “We got quite a lot of money out of it, lease money.”

When the wells became less profitable, the company sold them to the operator High Plains Gas. High Plains failed to meet state bonding requirements in 2014 and went out of business, leaving the state responsible for thousands of wells.





company can't do much about it, he said.

West said that many of his neighbors have orphan wells on their land, too. "I wouldn't say they're angry, they're just upset that it's taken so long to clean it up."

The surge in orphan wells has led Wyoming regulators to speed up plugging efforts and increase bonding requirements.

Luckily, coalbed methane wells are relatively shallow and inexpensive to plug — it costs \$5,000 to carefully fill a well with cement and seal it, on average, according to Watson. Some recent orphan wells have even been converted into water wells.

Between bonding payments and a conservation tax that oil and gas producers pay, Wyoming state regulators have been able to fund hundreds of plugging operations a year — mostly coalbed methane wells but some deeper oil and gas wells too — without burdening taxpayers.

Companies can now opt to either pay \$100,000 to cover reclamation costs for an unlimited number of wells in Wyoming or pay \$10 a foot of drilling depth to cover the cost of reclaiming each well.

Companies tend to choose a bonding option based on their size and planned operations. Companies also now must pay a one-time \$10 a foot bond on wells that are sitting idle.

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Industry leaders say they're happy with the cost increase. "We have a pretty workable solution," said John Robitaille, vice president of the Petroleum Association of Wyoming. He



Why 'Orphan' Oil And Gas Wells Are A Growing Pr...



Bill and Marjorie West were among the landowners who helped push for the changes. They are members of the Powder River Basin Resource Council, a community nonprofit that's spent years lobbying state and federal lawmakers on the orphan well issue.

In other energy-producing states, the orphan well problem is more of a slow burn.

In Pennsylvania, over 8,000 orphan and abandoned oil and gas wells need to be plugged. But the state's orphan well plugging program, which relies on drilling permit fees, could afford to plug just six wells last year, said Seth Pelepko, the manager of the well-plugging program at the Pennsylvania Department of Environmental Protection. The agency is looking for new sources of funding, such as state grants.

He said that, particularly in parts of the state that have seen decades of oil and gas development, people often don't know that the oil and gas wells on their property could be dangerous. "We've come across wells where folks have set up their garden around them," he said. In other places, wells date back to the 19th century and look like just another hole in the ground.

“

**We've come across wells where folks have set up their garden around them.**

—Seth Pelepko, program manager, Department of Environmental Protection

## The Bonding Dilemma

Jill Morrison, the executive director of the Powder River Basin Resource Council in Wyoming, says the solution to the orphan well problem is simple. When companies get a permit to drill, they should pay a hefty bond that covers the cost of plugging and reclaiming the well. If they plug the well themselves, they get the money back. If they don't, the state would have the money on hand to do the job.

But no state, including Wyoming, sets bonding amounts that high. Doing so would put many small-time oil and gas companies out of business.

The Colorado Oil and Gas Conservation Commission struggled with bonding requirements



Why 'Orphan' Oil And Gas Wells Are A Growing Problem





Aridlands LLC, served on the commission. His term ended in 2016.

### Colorado Oil and Gas Plugging and Abandonment Bonds

Bond Amount	Bond Description
-------------	------------------

\$10,000	Any well less than 3,000 feet deep
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\$20,000	Any well 3,000 feet deep or more
----------	----------------------------------

\$60,000	A group of wells under 100
----------	----------------------------

\$100,000	A group of 100 or more wells
-----------	------------------------------

Source: Colorado Oil and Gas Conservation Commission

“The big companies that could afford steep bonds were the least likely to run away and abandon things,” Alward said. Small companies that were more likely to go bust often couldn’t afford the large bond payments up front.

Colorado requires companies to put up a \$10,000 plugging and reclamation bond for any well less than 3,000 feet deep; \$20,000 for any well more than 3,000 feet deep; \$60,000 for a group of wells under a hundred; and \$100,000 for a group of a hundred or more wells.

In some cases, though, plugging a well can cost more than 10 times the bonding that companies post, said Dave Andrews, the manager of the Colorado’s orphan well program. In recent years, the state oil and gas conservation commission has been plugging about 10 wells a year on a budget of \$445,000 plus bond funding.

The oil and gas wells in Colorado may be deeper and thus more expensive to fill than the coalbed methane wells in Wyoming, Andrews said. And the commission estimated that it cost, on average, \$82,500 to plug a well and reclaim it.

To help the state oil and gas commission address its growing backlog of orphan wells — and do a better job reclaiming the land — the Colorado Legislature increased the funding for orphan well cleanup this fiscal year. There’s been no move to change bonding levels,

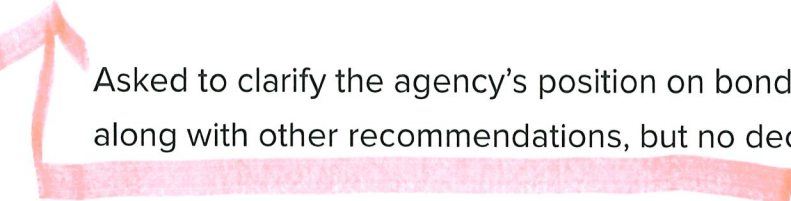


State authorities have done much more to address bonding inadequacy than the federal Bureau of Land Management, which hasn't raised bonding requirements since they were first set in the 1950s and '60s. It currently costs \$150,000 to bond for an unlimited number of wells nationwide drilled to capture federally owned minerals, which could lie beneath publicly or privately owned land.

The agency's record-keeping is so poor that it's impossible to say how much the federal government spends on orphan well cleanup, a Government Accountability Office report found this year. In the areas with the most oil and gas drilling on federal land, the agency spends close to \$270,000 for a well-plugging project, the report found. The agency counts 219 orphan wells under its jurisdiction.

Oil and gas industry groups have strongly opposed efforts to increase federal bonding requirements. Some environmentalists say that under the Trump administration, which wants to make it easier for companies to drill, bonding requirements aren't likely to change.

"The BLM is currently reviewing the GAO report and its recommendations in order to evaluate the best ways to manage and identify orphan and idle wells and determine appropriate next steps with the program," wrote Amber Cargile, an agency spokeswoman, in an email.



Asked to clarify the agency's position on bonding, she added: "We're looking at bonding along with other recommendations, but no decisions have yet been made."

West, the Wyoming rancher, said that the drilling on his land has caused no end of problems, from flooding to making his well water too salty to drink. But he said that even if he'd known what was to come, he still would have said yes to the coalbed methane companies.

"We would've, for the money," he said. He added that he'd just like to see regulation that would push companies to act more responsibly.

Meanwhile, Presley, the former High Plains CEO, hasn't given up on his coalbed methane dreams. He's about to launch a new company that will once more buy up idle wells and try to make them productive. He's hopeful that some of the landowners who said yes to High Plains Gas years ago will agree to work with him again.





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Why 'Orphan' Oil And Gas Wells Are A Growing Problem For States



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## Compendium Notes

The following URL

<https://www.psr.org/wp-content/uploads/2019/06/compendium-6.pdf>

is the definitive voice; it is the literature search; it is the sought after scientific evidence. And, it puts the lie to once relied upon (but unpublishable as scientific) CDPHE compilations based on cherry picked studies. It is essential reading for anyone making decisions about fracking. Selected excerpts from the document follow:

Rapid declines in the cost of wind, solar, and battery storage prices have now made renewable energy a cheaper alternative than coal and gas in most major economies. Note (25), Lazard: A leading financial advisory and asset management company, 2018.

Even as oil prices have rebounded somewhat during the past two years, fracking companies are, collectively, still spending more on drilling than they receive by selling oil and gas. (100, 101), NY Times, 2018; Reuters, 2019.

A new analysis shows that a 100 percent renewable energy system in the United States would reduce electricity costs. (26), "Renewable and Sustainable Energy", 2019.

New gas and oil infrastructure projects are now at risk for becoming stranded assets. Evidence shows that, even in the absence of new climate policies, continuing investments in fossil fuel exports may substantially harm the U.S. economy. (31), "Nature Climate Change", 2018.

Over 90 percent of all original research studies published from 2016-2018 on the health impacts of fracking found a positive association with harm or potential harm. (35).

Examination of the peer-reviewed medical, public health, biological, earth sciences, and engineering literature uncovered no evidence that fracking can be practiced in a manner that does not threaten human health.

By April 2019, the amount of natural gas burned off via flaring in the Permian oil fields had reached a record high and exceeded the amount of gas needed to power every residence in Texas. (107).

People living within setback distances are potentially vulnerable to thermal injury during a well blowout, and they are also susceptible to exposures of benzene and hydrogen sulfide at levels above those known to cause health risks.

In 29 out of 76 samples, toxin concentrations far exceeded federal health and safety standards, sometimes by several orders of magnitude. (170).

Over 300 water wells have been contaminated near pads.

About 10% of oil wells report spills each yr. About 5% of fracking fluid is lost to spills. Toxicity peaks during first days of flowback. Toxins from a leaking well can migrate 1 km/wk. Need tracers to demonstrate.

Water withdrawals for fracking can deplete water levels by 51% in nearby streams. Streams near drilling and fracking activity had significantly higher numbers of methane-metabolizing and methane-producing microorganisms.

In just one Oklahoma county alone, there were 400 cases where frack fluid from horizontal oil wells flooded nearby vertical wells. (284, 285).

For a treatment plant that was specially designed to treat fracking wastewater, researchers found contamination for many miles downstream with fracking-related chemicals that included radium, barium, strontium, and chloride, as well as endocrine-disrupting and carcinogenic compounds. Effluents were so radioactive that they approached levels that would, in some U.S. states, classify them as radioactive waste and necessitate special disposal. (291, 292)

EPA Deputy Administrator Tom Burke said in a statement to American Public Media, “We found scientific evidence of impacts to drinking water resources at each stage of the hydraulic fracturing cycle.” (307)

High salinity of fracking wastewater minimizes its recycling options and thus contributes to the need for disposal wells.

The steady rate of well contamination over time...suggests that well failures, rather than the process of hydraulic fracturing itself, was the mechanism that created migration pathways for the stray gas to reach drinking water sources. Of the 42 affected wells, 11 had already been identified by state regulators as suffering from “barrier failures.”<sup>316</sup> Fracking wastewater has contaminated surface water and soils throughout North Dakota.

Chemical products are formed during the process of fracking and its aftermath. Hence, non-toxic additives could potentially react with other substances to create harmful byproducts. The authors conclude that a comprehensive assessment of risks would require an unabridged list of the chemical additives used for fracking, and they call for full disclosure. (331, 332).

Fracking fluid was found to contain arsenic, benzene, cadmium, formaldehyde, lead, and mercury.<sup>336</sup>

Laboratory coding systems were used by design to obscure possible detections of certain chemical contaminants in residents’ drinking water.

Spraying of oil-field wastewater has contaminated groundwater in Kern County, California. Wastewater samples collected from 329 fracked oil wells found that virtually all—98 percent—contained benzene at levels that exceeded standards for permissible concentrations in drinking water. Cows in PA wandered through a spill of drilling wastewater. Of the calves born to the 28 cows, only six survived. (939).

A drilling company could follow procedures -- cementing and casing below the local aquifer — and still create a potential pathway for gas to migrate into drinking water.” (38).

A review of Pennsylvania Department of Environmental Protection files on fracking-related damage to drinking water revealed that 243 private water supplies in 22 counties had been contaminated or had lost flow and dried up as a result of nearby drilling and fracking operations in the past seven years.

The percentage of wells with some form of well barrier or integrity failure is highly variable and could be as high as 75 percent. Methane flow rates from plugged wells measured in this study were not

consistently lower than unplugged wells and indeed were sometimes higher, even though wells are plugged for the precise purpose of limiting the escape of gases. P. 214

A draft report from the Pennsylvania DEP described a 2008 incident in Pennsylvania in which a person died in an explosion triggered by lighting a candle in a bathroom after natural gas had seeped into a septic system from an abandoned well. P. 214

Data from the Colorado Oil and Gas Conservation Commission showed that fracking-related chemical spills in Colorado exceed an average rate of one spill per day. Of the 495 chemical spills that occurred in that state over a one-year period of time, nearly a quarter impacted ground or surface water.

A USGS study of pollution from oil production in North Dakota, where horizontal drilling and hydraulic fracturing are heavily used, identified two potential plumes of groundwater contamination covering 12 square miles.

State data in Colorado showed more than 350 instances of groundwater contamination resulting from more than 2,000 spills from oil and gas operations over the past five years.

Improper cementing and casing in one of the company's gas wells allowed methane to migrate underground and contaminate 16 private drinking water wells in Bradford County, PA. (460).

The chemical composition of fracking fluid and its interactions with black shale during the fracking process combine to make fracking waste radioactive. Explaining this finding in a news article, Makul Sharam said, "Radium is sitting on mineral and organic surfaces within the fracking site waiting to be dislodged. When water with the right salinity comes by, it takes on the radioactivity and transports it." (499).

Even if you take away the spill water, you've still left behind the legacy of radioactivity in the soils" where it can linger for thousands of years. (506).

Radium-226 concentrations increased when flowback water was being reused for additional fracking operations. Also, radium-226 tended to accumulate in the bottom sludge. This sludge could be classified as radioactive solid waste because it exceeded the radium-226 limit for landfill disposal.

Researchers found that buildings in counties where the most fracking has taken place in the past decade have had significantly higher radon readings compared with those in low-fracking areas, a difference that did not exist before 2004.

Once you have a release of fracking fluid into the environment, you end up with a radioactive legacy." (519).

if a million gallons of Marcellus Shale wastewater contaminated with the median level of radium found in New York were to spill into a waterway, 1.1 billion gallons of water would be required to dilute the radium to the maximum legal level. (525).

According to multiple studies in multiple states, the oil and gas industry's promises of job creation from drilling for natural gas have been greatly exaggerated. Many of the jobs are short-lived, have gone to out-of-area workers, and, increasingly, are lost to automation. Fracking is unlikely to be a panacea for economically marginalized rural, suburban, or urban areas, and economic optimism regarding fracking

tends to be overgeneralized, according to a study analyzing national data on socioeconomic wellbeing for the years 2000 to 2011.

Economists at Colorado State University quantified the “substantial environmental costs associated with hydraulic fracturing” as part of an analysis of the market and non-market costs and benefits of fracking in 14 U.S. states. These costs were “dominated by \$27.2 billion (\$12.5–\$41.95 billion) health damages from air pollution.” They also found costs including “\$3.8 billion (\$1.15–\$5.89 billion) in greenhouse gas emissions, \$4 billion (\$3.5–\$4.45 billion) in wildlife habitat fragmentation, and \$1 billion (\$0.5–\$1.6 billion) in pollution of private drinking water wells.”

In northeastern Colorado, ambient levels of atmospheric hydrocarbons have continued to increase even with stricter emission standards.

With increasing volumes of wastewater now exceeding the storage capacity for underground injection wells—and with underground injection linked to earthquake risk—Texas, Colorado, and New Mexico are now petitioning the EPA to allow release of fracking wastewater into rivers and streams and to allow its use for irrigation and watering livestock. These practices further imperil drinking water sources. (57).

Pollution near drilling and fracking operations is high enough in some Colorado communities to raise cancer risks, according to a 2018 study. (See footnote 145.)

A 2014 Colorado study found elevated incidence of neural tube defects and congenital heart defects. New studies in Texas and Colorado likewise found associations with infant deaths, high-risk pregnancies, and low birth weight. A 2017 pilot study in British Columbia found elevated levels of muconic acid—a marker of benzene exposure—in the urine of pregnant women living near fracking sites. (See footnotes 625, 627, 642, 664.)

Benzene has been detected in the urine of wellpad workers in Colorado.

A 2019 analysis of socio-demographic characteristics of people living close to drilling and fracking operations in the states of Colorado minorities, especially African Americans, disproportionately live near fracking wells.(111).

The rapidly expanding body of scientific evidence compiled and referenced in the present volume is massive, troubling, and cries out for decisive action. Across a wide range of parameters, from air and water pollution to radioactivity to social disruption to greenhouse gas emissions, the data continue to reveal a plethora of recurring problems and harms that cannot be sufficiently averted through regulatory frameworks. There is no evidence that fracking can operate without threatening public health directly and without imperiling climate stability upon which public health depends. The only method of mitigating its grave harm to public health and the climate is a complete and comprehensive ban on fracking.



# **Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking (Unconventional Gas and Oil Extraction)**

**Sixth Edition**

**June 2019**



Fracking rigs off of Interstate 20  
West of Midland, Texas, in the Permian Basin ©2018 Julie Dermansky



***The Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking*** (the Compendium) is a fully referenced compilation of evidence outlining the risks and harms of fracking. It is a public, open-access document that is housed on the websites of Concerned Health Professionals of New York ([www.concernedhealthny.org](http://www.concernedhealthny.org)) and Physicians for Social Responsibility ([www.psr.org](http://www.psr.org)).

The five earlier editions of the Compendium have been used and referenced all over the world. The Compendium has been twice translated into Spanish: independently in 2014 by a Madrid-based environmental coalition, followed by an official translation of the third edition, which was funded by the Heinrich Böll Foundation and launched in Mexico City in May 2016. The Compendium has been used in the European Union, South Africa, the United Kingdom, Australia, Mexico, and Argentina.

### **About Concerned Health Professionals of New York**

Concerned Health Professionals of New York (CHPNY) is an initiative by health professionals, scientists, and medical organizations for raising science-based concerns about the impacts of fracking on public health and safety. CHPNY provides educational resources and works to ensure that careful consideration of science and health impacts are at the forefront of the fracking debate.

### **About Physicians for Social Responsibility**

Working for more than 50 years to create a healthy, just, and peaceful world for both present and future generations, Physicians for Social Responsibility (PSR) uses medical and public health expertise to educate and advocate on urgent issues that threaten human health and survival, with the goals of reversing the trajectory towards climate change, protecting the public and the environment from toxic chemicals, and addressing the health consequences of fossil fuels. PSR was founded by physicians concerned about nuclear weapons, and the abolition of nuclear weapons remains central to its mission.

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## About this Report

The Compendium is organized to be accessible to public officials, researchers, journalists, and the public at large. The reader who wants to delve deeper can consult the reviews, studies, and articles referenced herein. In addition, the Compendium is complemented by a fully searchable, near-exhaustive citation database of peer-reviewed journal articles pertaining to shale gas and oil extraction, the Repository for Oil and Gas Energy Research, that was developed by PSE Healthy Energy and which is housed on its website (<https://www.psehealthyenergy.org/our-work/shale-gas-research-library/>).

For this sixth edition of the Compendium, as before, we collected and compiled findings from three sources: articles from peer-reviewed medical or scientific journals; investigative reports by journalists; and reports from, or commissioned by, government agencies. Peer-reviewed articles were identified through databases such as PubMed and Web of Science, and from within the PSE Healthy Energy database. We included review articles when such reviews revealed new understanding of the evidence.

Written in non-technical language, our entries briefly and plainly describe studies that document harm, or risk of harm, associated with fracking and summarize the principal findings. Entries do not include detailed results or a critique of the strengths and weaknesses of each study. Because much of medicine's early understanding of new diseases and previously unsuspected epidemiological correlations comes through assessment of case reports, we have included published case reports and anecdotal reports when they are data-based and verifiable.

The studies and investigations referenced in the dated entries catalogued in the Compilation of Studies & Findings are current through April 1, 2019. The footnoted citations here in the front matter represent studies and articles that are not referenced in the Compendium itself or which appeared as we went to press in June 2019.

Within the compiled entries, we have also provided references to articles appearing in the popular press, when available, that describe the results of the corresponding peer-reviewed study and place them in context with the results of other studies. For this purpose, we sought out articles that included comments by principal investigators on the significance of their findings. In such cases, footnotes for the peer-reviewed study and the matching popular article appear together in one entry. We hope these tandem references will make the findings more meaningful to readers.

Acronyms are spelled out the first time they appear in each section.

News articles appearing as individual entries signify reports that contain original research. In many cases, this reportage is based on data collected by industry or government agencies that were ferreted out by investigative journalists and not otherwise known to the scientific community.

While advocacy organizations have compiled many useful reports on the impacts of fracking, these, with few exceptions, do not appear in our Compendium unless they provide otherwise inaccessible data. We also excluded papers that focused purely on methodologies or instrumentation. For some sources, cross-referenced footnotes are provided, as when wide-

ranging government reports or peer-reviewed papers straddled two or more topics.

In our review of the data, seventeen compelling themes emerged, and these serve as the organizational structure of the Compendium. Readers will notice the ongoing upsurge in reported problems and health impacts, making each section top-heavy with recent data. In accordance, the Compendium is organized in reverse chronological order within sections, with the most recent information first.

The Compendium focuses on topics most closely related to the public health and safety impacts of unconventional gas and oil drilling and fracking. These necessarily include threats to climate stability.

Additional risks and harms arise from associated infrastructure and industrial activities that necessarily accompany drilling and fracking operations. A detailed accounting of all these ancillary impacts is beyond the scope of this document. Nevertheless, we include in this edition a section on impacts from fracking infrastructure that focuses on

- compressor stations and pipelines;
- silica sand mining operations;
- natural gas storage facilities;
- the manufacture and transportation of liquefied natural gas (LNG), and
- natural gas power plants.

(Research on gas-fired power plants appears in this edition for the first time. Note that threats from flare stacks are included in the section on air pollution.)

Many other relevant concerns—such as disposal of solid waste drill cuttings and the use of fracked gas as a feedstock in petrochemical manufacturing—are not included here. We hope to take up these issues in future editions.

Similarly, this edition of the Compendium does not examine the harms and risks posed by other forms of unconventional oil and gas extraction, such as cyclic steaming (which uses pressurized, superheated water to release oil), microwave extraction (which points microwave beams into shale formations to liquefy oil), and artificial lift (which uses gases, chemicals, or pumps to extract natural gas).

Given the rapidly expanding body of evidence related to the harms and risks of unconventional oil and gas extraction, we plan to continue revising and updating the Compendium approximately every year. It is a living document, housed on the websites of Concerned Health Professionals of New York and Physicians for Social Responsibility, which serves as an educational tool in important ongoing public and policy dialogues.

The Compendium is generally a volunteer project and has no dedicated funding; it was written utilizing the experience and expertise of numerous health professionals and scientists who have been involved in this issue for years.

We thank our external peer readers for their comments and suggestions: Casey Crandall; Laura Dagley, BSN, RN; Barbara Gottlieb; Robert Gould, MD; Jake Hays, MA; Douglas Hendren, MD, MBA; Lee Ann Hill, MPH; Robert Howarth, PhD; Anthony Ingraffea, PhD, PE;

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We welcome your feedback and comments.

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## **Foreword to the Sixth Edition**

### **The Compendium in Historical Context**

The release of the first edition of the Compendium by Concerned Health Professionals of New York in July 2014 coincided with a meteoric rise in the publication of new scientific studies about the risks and harms of fracking. A second edition was released five months later, in December 2014, and included new studies that further explicated recurrent problems.

Almost concurrently, on December 17, 2014, the New York State Department of Health (NYS DOH) released its own review of the public health impacts of fracking. (See footnote 655.) That document served as the foundation for a statewide ban on high-volume hydraulic fracturing (HVHF), announced by New York Governor Andrew Cuomo on the same day. Its conclusions—

[I]t is clear from the existing literature and experience that HVHF activity has resulted in environmental impacts that are potentially adverse to public health. Until the science provides sufficient information to determine the level of risk to public health from HVHF and whether the risks can be adequately managed, HVHF should not proceed in New York State.

The third edition of the Compendium, released in October 2015 and compiled as a joint effort with Physicians for Social Responsibility, included new peer-reviewed studies as well as the results of the first substantive government reports on the impacts of fracking. One of these was the New York State Department of Environmental Conservation's final environmental impact statement and attendant Findings Statement that incorporated the earlier health review into a larger analysis of the impacts of fracking. (See footnote 482.) The Findings Statement made clear that no known regulatory framework can adequately mitigate the multiple risks of fracking:

Even with the implementation of an extensive suite of mitigation measures...the significant adverse public health and environmental impacts from allowing high-volume hydraulic fracturing to proceed under any scenario cannot be adequately avoided or minimized to the maximum extent practicable....

In December 2015, the third edition became the basis of invited testimony at conferences taking place concurrently with the United Nations' climate talks in Paris. Those international negotiations resulted in an historical international accord, the Paris Agreement, which recognizes climate change as a grave threat to public health and establishes as a key goal the need to limit global temperature increases to 2° Celsius, or, ideally, 1.5° C, above pre-industrial times. As such, the treaty articulates a vision for energy by compelling nations to monitor their greenhouse gas emissions and set increasingly ambitious targets and timetables to reduce them.

The Compendium's fourth edition was released in November 2016, just as the Paris Agreement went into force and as several new studies conclusively demonstrated that expansion of shale gas and oil extraction was incompatible with climate stability and the goal of rapid decarbonization that it requires. All together, these data show that because of increasing emissions of methane—a powerful heat-trapping gas—the United States was on track to miss its pledge under the Paris Agreement to reduce greenhouse gas emissions 26-28 percent by 2025. (See footnotes 977 and

978.) The evidence showed that methane leaks from U.S. oil and gas operations were significantly higher than previously estimated, as were U.S. methane emissions overall. (See footnotes 979-981, 987, 998, and 999.)

The fifth edition, released in March 2018, was launched in a time of deep environmental retrenchment by the U.S. government. The Trump administration had announced an era of “energy dominance” based on surging domestic production of oil and natural gas, most of it extracted via fracking. References to climate change were removed altogether from some government websites. Greenhouse gas emissions were no longer to be considered in National Environment Policy Act reviews. The White House announced its intent to withdraw from the Paris Agreement even as the American Meteorological Society released a major report that identified climate change as a contributor to several recent extreme weather events and even as the Fourth National Climate Assessment—a quadrennial report compiled by 13 federal agencies—confirmed human activities as the dominant cause for ongoing global warming.<sup>1, 2</sup>

Included in the federal environmental rules rescinded during this period were many that governed drilling and fracking operations. The Bureau of Land Management’s (BLM) Waste Prevention Rule, requiring companies drilling on public and tribal lands to reduce methane leaks and cut back on flaring and venting, was suspended. The U.S. Environmental Protection Agency (EPA) canceled a system for existing oil and gas facilities to report methane leaks and delayed implementation of a rule that would have limited methane emissions from new oil and gas drilling sites. The U.S. Department of the Interior rescinded a rule to require disclosure of chemicals in fracking fluid on public lands and tighten standards for well construction and wastewater disposal. The White House revoked policies that had prevented the construction of the Dakota Access Pipeline. That pipeline now carries fracked oil from the Bakken Shale in North Dakota to an oil storage hub in Illinois.<sup>3, 4</sup>

This current sixth edition of the Compendium arrives at a time of starkly contradictory trends.

On the one hand, aggressive attacks on regulatory oversight of U.S. oil and gas extraction continue and now extend to the science underlying the targeted regulations. A recent EPA directive has banned scientists who received EPA funding from sitting on panels that advise the agency on scientific matters.<sup>5</sup> An order issued by the White House-appointed director of the U.S.

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<sup>1</sup> Herring, S. C., Christidis, N., Hoell, A., Kossin, J. P., Schreck III, C. J., & Stott, P. A. (2017). Explaining extreme events of 2016 from a climate perspective. *Bulletin of the American Meteorological Society*, 99(1), S1–S157. doi: 10.1175/BAMS-ExplainingExtremeEvents2015

<sup>2</sup> U.S. Global Change Research Program. (2017). *Climate science special report: Fourth National Climate Assessment, Volume I*. Retrieved from <https://www.globalchange.gov/browse/reports/climate-science-special-report-fourth-national-climate-assessment-nca4-volume-i>

<sup>3</sup> Harvard University Environmental Law Program. (2019). Environmental regulation rollback tracker. <http://environment.law.harvard.edu/policy-initiative/regulatory-rollback-tracker/>

<sup>4</sup> Mooney, C. (2017, December 29). To round out a year of rollbacks, the Trump administration just repealed key regulations on fracking. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/energy-environment/wp/2017/12/29/to-round-out-a-year-of-rollbacks-the-trump-administration-just-repealed-key-regulations-on-fracking/?utm\\_term=.f16b4db99128](https://www.washingtonpost.com/news/energy-environment/wp/2017/12/29/to-round-out-a-year-of-rollbacks-the-trump-administration-just-repealed-key-regulations-on-fracking/?utm_term=.f16b4db99128)

<sup>5</sup> Stempel, J. (2019, June 3). U.S. EPA is sued for ousting scientists from advisory panels. *Reuters*. Retrieved from <https://www.reuters.com/article/us-epa-lawsuit/us-epa-is-sued-for-ousting-scientists-from-advisory-committees-idUSKCN1T42H8>

Geological Survey (USGS) now prohibits that agency's scientists from generating climate models beyond the year 2040.<sup>6</sup>

The feverish pace of U.S. oil and gas extraction also continues. Unimpeded by federal regulations and driven by fracking, U.S. oil and gas production has reached record levels, which, in turn, has spurred a massive build-out of fracking infrastructure. The Federal Energy Regulatory Commission (FERC) has eased the process to build new pipelines, and even more public lands have been opened to oil and gas extraction.<sup>7</sup> One executive order has impeded the ability of states to block pipeline construction, while another has transferred power for international pipeline approval from the U.S. State Department to the President.<sup>8</sup> As the U.S. Energy Information Administration (EIA) forecasts record build-out of natural gas pipelines, the Pipeline and Hazardous Materials Safety Administration (PHMSA) has urged Congress to expand a law that treats some kinds of citizen protests against pipeline construction as federal crimes.<sup>9</sup>

The White House policy of energy dominance also continues apace. In the face of flattening domestic demand for gas, the ongoing fracking boom is increasingly directed at export markets.<sup>10</sup> The United States is on track to become the world's largest international seller of natural gas. As of this writing, three liquefied natural gas (LNG) export terminals are operational with more than a dozen new LNG terminals in the planning or development stage. Exports of LNG from the United States to the European Union alone have increased by 181 percent since July 2018.<sup>11</sup> In May 2019, the U.S. Department of Energy introduced the terms "freedom gas" and "molecules of U.S. freedom" to refer to LNG exports.<sup>12</sup> In June 2019, as we went to press, the Delaware River Basin Commission approved a plan to construct an LNG terminal on the Delaware River in Gibbstown, New Jersey with the aim of exporting natural gas extracted from shale gas wells in Pennsylvania.<sup>13, 14</sup> The gas would be trucked to the export terminal from a new LNG liquefaction plant planned for Pennsylvania's Bradford County.<sup>15</sup>

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<sup>6</sup> Davenport, C. (2019, May 27). Trump administration hardens its attack on climate science. *New York Times*. Retrieved from <https://www.nytimes.com/2019/05/27/us/politics/trump-climate-science.html>

<sup>7</sup> Leven, R., (2018, November 13). Drilling overwhelms agency protecting America's lands. *Associated Press*. Retrieved from <https://www.apnews.com/dac08562077c41a8a08845a291cbfb6c>

<sup>8</sup> Kusnetz, N. (2019, April 11). Trump aims to speed pipeline projects by limiting state environmental reviews. *Inside Climate News*. Retrieved from <https://insideclimatenews.org/news/11042019/trump-pipeline-executive-order-environmental-review-keystone-xl-clean-water-act-states-rights>

<sup>9</sup> Budryk, Z. (2019, June 3). Transportation Department seeks to crackdown on pipeline protests: Report. *The Hill*. Retrieved from <https://thehill.com/policy/transportation/446765-transportation-department-seeks-to-crack-down-on-pipeline-protests>

<sup>10</sup> Proctor, D. (2019, April 1). Plenty of natural gas around—it just needs a market. *Power Magazine*. Retrieved from <https://www.powermag.com/plenty-of-natural-gas-to-go-around-it-just-needs-a-market/>

<sup>11</sup> European Commission. (2018, March 8). EU-U.S. joint statement: Liquefied Natural Gas (LNG) imports from the U.S. continue to rise, up by 181% [Press release.] Retrieved from [http://europa.eu/rapid/press-release\\_IP-19-1531\\_en.htm](http://europa.eu/rapid/press-release_IP-19-1531_en.htm)

<sup>12</sup> U.S. Department of Energy (2019, May 29). Department of Energy authorizes additional LNG exports from Freeport LNG [Press release]. Retrieved from <https://www.energy.gov/articles/department-energy-authorizes-additional-lng-exports-freeport-lng>

<sup>13</sup> Maykuth, A. (2019, June 12). Contentious plan to remake N.J. dynamite plant into shale-gas export terminal is approved *Philadelphia Inquirer*. <https://www.inquirer.com/business/lng-export-terminal-philadelphia-repauno-fortress-approved-20190612.html>



Similarly, by September 2018, the United States had become the world's leading oil producer, surpassing both Russia and Saudi Arabia.<sup>16</sup> U.S. oil production is forecast to increase by 30 percent by 2023, with much of that growth driven by fracking operations in the Permian Basin of West Texas and eastern New Mexico. The Permian is now the leading source of U.S. crude oil exports.<sup>17</sup>

On the other hand, the ongoing U.S. fracking boom and its protracted deregulation are at odds with the emerging scientific consensus on the scale and tempo of necessary climate change mitigation and with rising public alarm about the impending climate crisis that this consensus has amplified. In some cases, Trump-era rollbacks have been reversed. In March 2019, a U.S. district judge blocked leasing of public lands for fracking in Wyoming on the grounds that the BLM had not considered greenhouse gas emissions.<sup>18</sup> (Physicians for Social Responsibility was a party to this lawsuit.) The National Aeronautics and Space Administration's (NASA) Carbon Monitoring System, targeted by the White House for elimination in 2018, was refunded by Congress in 2019.<sup>19</sup>

In October 2018, in its first commissioned report under the Paris Agreement, the United Nations Intergovernmental Panel on Climate Change (IPCC) announced that emissions from oil and gas must decline swiftly within the next decade—a trend not compatible with further build-out of oil and gas infrastructure. Specifically, the IPCC found that global warming above 1.5° C is likely to result in irreversible points of no return and cascading, uncontrollable harms, including wholesale loss of coral reefs, loss of ocean fish stocks, widespread crop failures, flooding of coastal cities, multiple public health crises, and social disruption. To avoid the worst of these outcomes, the world needs to reduce greenhouse gas emissions by 45 percent by 2030 and reach net zero by 2050.<sup>20, 21</sup>

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<sup>14</sup> Hurdle, J. (2019, June 15). Delaware River Basin Commission confirms plan to build LNG export terminals at new South Jersey port. *State Impact Pennsylvania*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2019/06/15/delaware-river-basin-commission-confirms-plan-to-build-lng-export-terminal-at-new-south-jersey-port/>

<sup>15</sup> Maykuth, A. (2019, June 9). The 'hidden' plan to remake an old dynamite factory near Philly into a major gas export terminal. *Philadelphia Inquirer*. Retrieved from <https://www.inquirer.com/business/energy/philadelphia-lng-export-terminal-delaware-river-fortress-20190609.html>

<sup>16</sup> U.S. Energy Information Administration. (2018, September 12). The United States is now the largest global crude oil producer. *Today in Energy*. Retrieved from <https://www.eia.gov/todayinenergy/detail.php?id=37053>

<sup>17</sup> Collier, K., Hopkins, J. S., & Leven, R. (2018, October 11). As oil and gas exports surge, West Texas becomes the world's "extraction colony." *Texas Tribune* and Center for Public Integrity. Retrieved from <https://www.texastribune.org/2018/10/11/west-texas-becomes-worlds-extraction-colony-oil-gas-exports-surge/>

<sup>18</sup> Groom, N. (2019, March 20). U.S. judge blocks drilling over climate change, casting doubt on Trump agenda. *Reuters*. Retrieved from <https://www.reuters.com/article/us-usa-drilling-lawsuit/u-s-judge-blocks-drilling-over-climate-change-casting-doubt-on-trump-agenda-idUSKCN1R11YL>

<sup>19</sup> Popkin, G. (2019 February 28). New budget bill rescues NASA's carbon monitoring program. *Eos*. Retrieved from <https://eos.org/articles/new-budget-bill-rescues-nasas-carbon-monitoring-system>

<sup>20</sup> Masson-Delmotte, V., Zhai, P., Pörtner, H. O., Roberts, D., Skea, J. Shukla, P. R., . . . Waterfield, T. (eds.). (2018). Global Warming of 1.5°C: An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty. World Meteorological Organization. Retrieved from <https://www.ipcc.ch/sr15/>

<sup>21</sup> Davenport, C. (2018, October 7). Major climate report describes a strong risk of crisis as early as 2040. *New York Times*. Retrieved from <https://www.nytimes.com/2018/10/07/climate/ipcc-climate-report-2040.html>

These findings were confirmed and expanded upon in another landmark paper published in April 2019 by an international team of scientists who warned that “it has become clear that beyond 1.5° C, the biology of the planet becomes gravely threatened because ecosystems literally begin to unravel.”<sup>22</sup>

In May 2019, a joint appeal from the leaders of the United Nations System organizations urged world political leaders “with great urgency” to accelerate mitigation efforts in order to limit the global temperature to 1.5° C above pre-industrial levels, referring to this limit as a “moral, economic imperative.”<sup>23</sup>

The ongoing fracking boom is also at odds with trends in the economics of renewable energy. The ongoing build-out of natural gas pipelines has been accompanied by an ongoing wave of natural gas power plant construction across the United States. In 2018, 35 percent of electricity in the United States was generated in gas-fired power plants—a figure that is forecast to rise to 38 percent by 2020.<sup>24</sup> At the same time, rapid declines in the cost of wind, solar, and battery storage prices have now made renewable energy a cheaper alternative than coal and gas in most major economies.<sup>25</sup> A new analysis shows that a 100 percent renewable energy system in the United States would reduce electricity costs.<sup>26</sup>

Indeed, renewables are already replacing existing gas plants in some cases. In 2018, three large gas-fired power plants closed in California, with more retirements planned as wind and solar replace gas for electrical generation.<sup>27, 28</sup> In March 2019, Florida Power and Light announced it would retire two natural gas plants and replace them with a massive solar-powered battery bank.<sup>29</sup> In April 2019, Indiana regulators rejected a proposal to replace three retiring coal plants

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<sup>22</sup> Dinerstein, E., Vynne, C., Sala, E., Joshi, A. R., Fernando, S., Lovejoy, T. E., . . . Wikramanayake, E. (2019). A global deal for nature: guiding principles, milestones, and targets. *Science Advances*, 5(4), 1-17. doi: 10.1126/sciadv.aaw2869

<sup>23</sup> United Nations Development Program (2019, May 10). Climate action summit: A joint appeal from the UN system to the Secretary-General’s climate action summit. Retrieved from <https://www.undp.org/content/undp/en/home/news-centre/speeches/2019/climate-action-summit.html>

<sup>24</sup> U.S. Energy Information Administration. (2019, May 7). Short-term energy outlook. Retrieved from <https://www.eia.gov/outlooks/steo/report/>

<sup>25</sup> Lazard. (2018, November 8). Levelized cost of energy and levelized cost of storage 2018. Retrieved from <https://www.lazard.com/perspective/levelized-cost-of-energy-and-levelized-cost-of-storage-2018/>

<sup>26</sup> Aghahosseini, A., Bogdanov, D., Barbosa, L. S. H. S., & Breyer, C. (2019) Analysing the feasibility of powering the Americas with renewable energy and inter-regional grid interconnections by 2030. *Renewable and Sustainable Energy Reviews*, 105, 187-205. doi: 10.1016/j.rser.2019.01.046

<sup>27</sup> Specht, M. (2019, February 25). Natural gas power plant retirements in California. Union of Concerned Scientists. Retrieved from <https://blog.ucsusa.org/mark-specht/gas-retirements-california>

<sup>28</sup> Groom, N. (2019, February 12). Los Angeles abandons new natural gas plants in favor of renewables. *Reuters*. <https://www.reuters.com/article/us-usa-california-natgas/los-angeles-abandons-new-natural-gas-plants-in-favor-of-renewables-idUSKCN1Q12C9>

<sup>29</sup> Geuss, M. (2019, March 29). Florida utility to close natural gas plants, build massive solar-powered battery. *Ars Technica*. Retrieved from <https://arstechnica.com/information-technology/2019/03/florida-utility-to-close-natural-gas-plants-build-massive-solar-powered-battery/>

with a massive natural gas plant over concerns that gas was a risky investment “if alternatives decline in price.”<sup>30</sup>

With an economic lifespan of between 30 and 50 years, new gas and oil infrastructure projects are now at risk for becoming stranded assets. Evidence shows that, even in the absence of new climate policies, continuing investments in fossil fuel exports may substantially harm the U.S. economy.<sup>31</sup>

## Expanding Knowledge Base

Even as we compiled entries for this sixth edition, the authors of the Compendium continued to see evidence of, and appreciate, the rapid expanse of our knowledge base. The Compendium exists within a moving stream of data.

As is revealed in the Repository for Oil and Gas Energy Research (ROGER), the database of literature maintained by PSE Healthy Energy, the number of peer-reviewed publications relevant to assessing the environmental, socioeconomic, and public health impacts of shale gas development doubled between 2011 and 2012. It doubled again between 2012 and 2013.<sup>32</sup>

This trend continues. More than half of the peer-reviewed scientific papers on the risks and harms of fracking have been published since January 2016. Indeed, 20 percent (355 studies) of the now more than 1,700 available studies were published in 2018 alone.

As of April 16, 2019, there were 1,778 published peer-reviewed studies that pertain to shale and tight gas development archived in the ROGER database.<sup>33</sup>

This body of evidence clearly reveals both potential and actual harms. Specifically, PSE’s statistical analysis of the scientific literature available from 2009 to 2015 demonstrates that:

- 69 percent of original research studies on water quality found potential for, or actual evidence of, fracking-associated water contamination,
- 87 percent of original research studies on air quality found significant air pollutant emissions, and
- 84 percent of original research studies on human health risks found signs of harm or indication of potential harm.<sup>34</sup>

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<sup>30</sup> Bade, G. (2019, April 25). Indiana regulators reject Vectren gas plant over stranded asset concerns. *Utility Dive*. Retrieved from <https://www.utilitydive.com/news/indiana-regulators-reject-vectren-gas-plant-over-stranded-asset-concerns/553456/>

<sup>31</sup> Mercure, J.-F., Pollitt, H., Viñuales, J. E., Edwards, N. R., Holden, P. B., Chewpreecha, U., . . . & Knobloch, F. (2018). Macroeconomic impact of stranded fossil fuel assets. *Nature Climate Change* 8, 588-593. doi: 10.1038/s41558-018-0182-1

<sup>32</sup> PSE Healthy Energy (2016, April 20). The science on shale gas development [infographic]. Retrieved from [http://www.psehealthyenergy.org/data/PSE\\_FrackingStudy\\_Summary\\_Infographic\\_4-20-2016\\_00.jpg](http://www.psehealthyenergy.org/data/PSE_FrackingStudy_Summary_Infographic_4-20-2016_00.jpg)

<sup>33</sup> PSE Healthy Energy. Repository for Oil and Gas Research (ROGER). <https://www.psehealthyenergy.org/our-work/shale-gas-research-library/>

A follow-up analysis using the same criteria for inclusion found that 90.3 percent of all original research studies published from 2016-2018 on the health impacts of fracking found a positive association with harm or potential harm.<sup>35</sup>

## Timeline of Bans and Moratoria

As a response to the proliferating evidence of the risks and harms of fracking—augmented by increasing concern about the many remaining uncertainties—various countries, states, and municipalities have instituted bans and moratoria.

France banned fracking in July 2011 and Bulgaria in January 2012.

In May 2012, the state of Vermont banned fracking and prohibited the storage and treatment of fracking waste.

In July 2012, a revision of environmental laws in Austria prompted the main Austrian oil and gas group to announce a stop to its shale gas plans in the country.

In April 2013, the Luxembourg parliament passed a motion against shale gas exploration in a decision that has not been revisited since.

In July 2014, the Flanders region of Belgium temporarily banned fracking. This ban is still valid.

The California counties of Santa Cruz, San Benito, and Mendocino counties all banned fracking in 2014.

New York State banned fracking in December 2014.

In January 2015, Scotland became the first country in Great Britain to impose a formal moratorium on fracking. In 2016, as part of the ongoing moratorium process, the government of Scotland released a series of reports that reconfirmed the evidence for potential contamination of air and water, threats to worker health from silica dust exposure, and risks to the health of nearby residents. It further noted that the pursuit of unconventional oil and gas extraction would make it more difficult for Scotland to achieve its climate targets on greenhouse gas emissions.<sup>36, 37</sup>

Scotland's moratorium was extended "indefinitely" in October 2017. In March 2019, a decision to solidify that prohibition into a full legislative ban was delayed.

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<sup>34</sup> Hays, J., & Shonkoff, S. B. C. (2016). Toward an understanding of the environmental and public health impacts of shale gas development: An analysis of the peer-reviewed scientific literature, 2009-2015. *PLOS One*, 11(4), e0154164. doi: 10.1371/journal.pone.0154164

<sup>35</sup> Ferrar, K., Jackson, E., & Malone, S. (2019). Categorical review of health reports on unconventional oil and gas development: Impacts in Pennsylvania. FracTracker Alliance Issue Paper. Retrieved from [https://www.delawariverkeeper.org/sites/default/files/FracTrackerAlliance\\_DRKHealthReview\\_Final\\_4.25.19\\_0.pdf](https://www.delawariverkeeper.org/sites/default/files/FracTrackerAlliance_DRKHealthReview_Final_4.25.19_0.pdf)

<sup>36</sup> Health Protection Scotland. (2016, November). *A health impact assessment of unconventional oil and gas in Scotland*, vol. 1. Retrieved from <http://www.hps.scot.nhs.uk/resourcedocument.aspx?resourceid=3102>

<sup>37</sup> Committee on Climate Change. (2016, August). *Scottish unconventional oil and gas: Compatibility with Scottish greenhouse gas emissions targets*. Retrieved from <http://www.gov.scot/Resource/0050/00509324.pdf>

In February 2015 the government of Wales declared a moratorium on fracking “until it is proven safe.” In July 2018, the Welsh government confirmed that shale gas was not compatible with decarbonization targets and said it would not support applications for fracking.

In March 2015, the Canadian province of New Brunswick declared a moratorium on fracking.

In July 2015, the Netherlands banned all shale gas fracking until 2020 on the grounds that “research shows that there is uncertainty” about impacts. In October 2018, the Dutch government announced that gas extraction of all kinds in the Groningen gas field would entirely cease by 2030 after public outcry over continuing earthquakes in the region. Gas production has already been cut by 60 percent since its peak in 2013. On May 22, 2019, Groningen was hit with a magnitude 3.4 earthquake that damaged multiple homes.<sup>38</sup>

In September 2015, Northern Ireland effectively banned fracking via strategic planning policies.

In December 2015, the plenary of the European Parliament affirmed the incompatibility of shale gas extraction via hydraulic fracturing with the European Union’s commitment to decarbonization, and it acknowledged public concerns about the environmental and health impacts of fracking. While falling short of an outright EU-wide moratorium on fracking, the report states that “it is questionable whether hydraulic fracturing can be a viable technology in the European Union.”<sup>39</sup>

In Florida, 90 municipalities have either banned fracking outright or passed resolutions opposing it. In the past three legislative sessions, a bipartisan coalition of lawmakers has introduced statewide ban legislation. During his 2018 campaign, Governor Ron DeSantis pledged publicly to issue a statewide ban. As of this publication, he has yet to do so.

Also in 2016, New Brunswick extended its moratorium on fracking “indefinitely,” citing unresolved problems with the disposal of fracking wastewater, and in the Canadian province of Newfoundland and Labrador, where a moratorium had been in place since 2013, a government-appointed panel recommended that fracking remain “paused,” citing data gaps and unresolved questions about the underlying geology.

In June 2016, Germany adopted a moratorium on “unconventional fracking” until 2021 but will permit exploratory drilling research projects.

Also in 2016, California’s Butte and Alameda counties banned fracking, along with Monterey County, which also banned all new oil drilling.

In August 2016, the Australian state of Victoria declared a permanent ban on fracking on the grounds that the risks outweighed any potential benefits.

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<sup>38</sup> (2019, May 22). Groningen hit by strong earthquake as gas extraction impact continues. *DutchNew.nl*. Retrieved from <https://www.dutchnews.nl/news/2019/05/groningen-hit-by-strong-earthquake-as-gas-extraction-impact-continues/>

<sup>39</sup> Committee on Industry, Research and Energy. (2015, November 24). *Report on Towards a European Energy Union*, A8-0341/2015. Retrieved from <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//TEXT+REPORT+A8-2015-0341+0+DOC+XML+V0//EN>

In September 2016, a California judge, arguing that the agency had failed to consider the dangers of fracking, struck down a bid by the BLM to open one million acres of public land in central California to oil drilling.

In November 2016, Winona County, Minnesota banned the mining of frack sand, a decision that was upheld in district court in November 2017. That ruling is now before the Minnesota Supreme Court.<sup>40</sup>

In December 2016, the Portland City Council in Oregon approved zoning code changes that banned the construction of new fossil fuel projects, including terminals for storing and transporting natural gas, and also prohibited the expansion of pre-existing facilities, including an LNG plant.

In March 2017, the Spanish region of Castilla Leon signed a political agreement to give up on shale gas exploration. This decision followed the implementation of several other regional bans in Spain or laws that otherwise made fracking unviable. These regions include Cantabria (April 2013), La Rioja (May 2013), Catalonia (February 2014), Basque Country (June 2015), and Castillo La Mancha (March 2017).

In April 2017, Maryland became the third U.S. state to ban fracking when Governor Larry Hogan signed a ban bill that was overwhelmingly approved by the state legislature. Maryland's ban followed a two-and-a-half-year statewide moratorium.

Also in April 2017, Entre Ríos passed the first province-wide ban on fracking in Argentina. This ban follows 50 individual municipal bans and is intended to protect the Guarani Aquifer, which extends beneath parts of Argentina, Brazil, Paraguay, and Uruguay.

In June 2017, France expanded its fracking ban to include a ban on all new oil and gas exploration.

In July 2017, Ireland banned fracking when legislation was signed into law by the president.

Also in October 2017, Canada's Prince Edward Island included a prohibition on fracking as part of its Water Act.

According to campaigners, Albania enacted a national ban on fracking in 2017, but these reports remain unconfirmed by official sources.

In December 2017, Uruguay prohibited fracking for four years.

In March 2018, the Australian state of Tasmania extended its moratorium on fracking until 2025.

In November 2018, the Delaware River Basin Commission—which consists of governors from the four states of New York, New Jersey, Pennsylvania, and Delaware together with the U.S. Army Corps of Engineers—released a proposed rule to ban fracking in the Delaware River watershed on the grounds that fracking exposes its waters to “significant, immediate, and long-term risks.” As currently drafted, the rule provides for importation of wastewater from fracking

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<sup>40</sup> Rogers, C. (2019, April 17). Supreme Court considers frac ban. *Winona Post*. Retrieved from <http://www.winonapost.com/Article/ArticleID/63818/Supreme-Court-considers-frac-ban>

operations located outside the Basin for storage, processing, and discharge within the Basin. It also provides for water withdrawals from the Delaware River and its tributaries for export and use in such operations.<sup>41, 42</sup> The longest free-flowing river in the Northeast, the Delaware River provides drinking water to more than 15 million people (approximately five percent of the U.S. population). About one-third of the river system flows through shale formations. A de facto moratorium on fracking in the Delaware River Basin has been in place since 2010.

In December 2018, the newly elected president of Mexico announced a suspension of all further energy auctions for three years, temporarily halting permits for new fracking operations. This announcement is widely seen as a possible step by President Obrador toward fulfilling a campaign promise to ban fracking in Mexico.<sup>43</sup>

On May 8, 2019, Washington State enacted a statewide ban on fracking.

On May 29, 2019, the Oregon Senate passed a five-year fracking moratorium. On June 17, Governor Kate Brown signed the bill into law.

In Connecticut, where no fracking or potential fracking takes place, ordinances prohibiting the storage or use of imported fracking waste have been passed in 56 municipalities. As we went to press in June 2019, the State House of Representatives, in a near-unanimous vote, passed a bill that enacts a permanent statewide ban on the disposal of oil and gas extraction waste, following a unanimous vote by the Connecticut Senate in May. The bill now goes to Governor Ned Lamont for signing.

Also, as we went to press, the New York State Senate voted for a bill that would end special exemptions from hazardous waste laws that allow fracking waste to be imported from out of state and dumped in municipal waste landfills and wastewater treatment plants. The bill now goes to the State Assembly for consideration. In spite of the statewide fracking ban, seven different landfills across New York State accept liquid and solid fracking waste from Pennsylvania. Seven New York county legislatures have banned that practice.

In sum, as evidence continues to mount of its environmental and public health costs, legislative and governmental bodies are increasingly apprehensive about the risks and harms of fracking.

Nevertheless, in several notable cases, hard-won bans and other restrictions on fracking have been overturned.

A fracking ban passed by the city of Denton, Texas in November 2014 was invalidated in June 2015 by a state law, pushed by the oil and gas industry, that prohibits Texas municipalities from passing local bans.

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<sup>41</sup> Delaware River Basin Commission. (2017, November 30). Proposed new 18 CFR part 440—hydraulic fracturing in shale formations. Retrieved from [http://www.nj.gov/drbc/library/documents/HydraulicFracturing/18CFR440\\_HydraulicFracturing\\_draft-for-comment\\_113017.pdf](http://www.nj.gov/drbc/library/documents/HydraulicFracturing/18CFR440_HydraulicFracturing_draft-for-comment_113017.pdf)

<sup>42</sup> Hurdle, J. (2017, November 30). Fracking ban proposed for Delaware River basin; ‘significant risks’ cited. *StateImpact Pennsylvania*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2017/11/30/fracking-ban-proposed-for-delaware-river-basin-significant-risks-cited/>

<sup>43</sup> Bertram, R. (2019, April 17). Will fracking be banned in Mexico? *Energy Transition*. Retrieved from

In June 2015, citing concerns about noise impacts and the industrialization of rural landscape, the county of Lancashire in northwest England halted plans for a major British fracking operation. Years previously, two wells—the first and only pair ever drilled in Lancashire—had suffered well integrity failures and caused earthquakes. However, in 2016, the national government overturned Lancashire’s ban, and drilling began in October 2017 despite widespread, ongoing public opposition.

In May 2016, the Colorado Supreme Court struck down local fracking bans in the cities of Fort Collins and Longmont. A statewide ballot measure to increase well setback distances in Colorado subsequently failed in November 2018. In January 2019, the Colorado Supreme Court ruled against a case brought by six youth that would have halted new drilling permits pending a comprehensive study of health and environmental impacts. The ruling allows Colorado to continue to weigh costs and technical feasibility against adverse public health impacts. However, in April 2019, the Colorado State legislature passed a bill that grants municipalities more regulatory authority over fracking activities.

In December 2017, Australia’s Northern Territory government delayed a decision on whether or not to extend or lift its own moratorium on fracking after a draft final report identified multiple risks to water, land, tourism, and indigenous culture. In April 2018, it lifted this moratorium.

In November 2018, the statewide moratorium in Western Australia was lifted over intense opposition, highlighting the limitations of aboriginal land rights. However, local bans in heavily populated areas of the state were left in place.



## **Introduction to Fracking**

Since the end of the 20<sup>th</sup> century, horizontal drilling has been combined with high-volume hydraulic fracturing to create a novel approach to extracting dispersed oil and natural gas, primarily from shale bedrock, that would otherwise not flow to the surface. Typically, these unconventional extraction methods (collectively known as “fracking”) take place on clustered multi-well pads where individual wellbores extend vertically down into the shale formation and then turn horizontally, tunneling through the shale in various directions. These lateral tunnels can extend as far as two miles underground.

To liberate the gas (methane) or oil trapped inside the shale, many small explosive charges followed by high volumes of pressurized fluid are sent into the shale layer to expand and extend its many naturally occurring cracks, bedding planes, and faults. Silica sand grains (or sometimes ceramic beads) are carried by the pressurized fluid into these spaces and remain there after the pressure is released, acting to prop open these now-widened fissures in the shale and allowing the methane or oil trapped within to flow up the well.

Fracking fluid consists of millions of gallons of fresh water to which is added a sequence of chemicals that include biocides, lubricants, gelling agents, anti-scaling, and anti-corrosion agents. Some of the water used to frack wells remains trapped within the fractured zone and, as such, is permanently removed from the hydrologic cycle. The remainder travels back up to the surface. This flowback fluid contains not only the original chemical additives, many of which are toxic, but also harmful substances carried up from the shale zone, which often include brine, heavy metals, and radioactive elements.

Once in production, a fracked well continues to generate liquid throughout its lifetime. This produced water, which contains many of the same toxic substances as flowback fluid, is a second component of fracking waste, and it also requires containment and disposal. In addition, fracking waste includes solid drilling cuttings, which are typically laced with various chemical substances used to aid the drilling process. These cuttings, which can also contain radioactive elements, are typically disposed in municipal waste landfills. Fracking waste is exempt from federal hazardous waste regulations that would otherwise prohibit this practice.

Downstream elements of fracking infrastructure, which lie between the wellhead and the point of combustion, include processing plants, transport infrastructure such as pipelines and compressor stations, distribution lines storage facilities, gas-fired power plants, and LNG liquefaction plants and export terminals. Upstream elements include silica sand mining operations and water withdrawal operations.

As fracking operations in the United States have increased in frequency, size, and intensity, and as the transport of extracted materials has expanded, a significant body of evidence has emerged to demonstrate that these activities are dangerous to people and their communities in ways that are difficult—and may prove impossible—to mitigate. Risks include adverse impacts on water, air, agriculture, public health and safety, property values, climate stability, and economic vitality, as well as earthquakes.

Researching these complex, large-scale industrialized activities and the ancillary infrastructure that supports them takes time and has been hindered by institutional secrecy. Nonetheless, research is gradually catching up to the last decade's surge in fracking from shale. A growing body of peer-reviewed studies, accident reports, and investigative articles has detailed specific, quantifiable evidence of harm and has revealed fundamental problems with the entire life cycle of operations associated with unconventional drilling, fracking, and fracked-gas infrastructure. Industry studies, as well as independent analyses, indicate inherent engineering problems including uncontrolled and unpredictable fracturing, induced seismicity, extensive methane leakage, and well casing and cement failures that cannot be prevented with currently available materials and technologies.

Fracking-related problems also originate from sources independent of engineering. These include habitat destruction; inadequate solutions for wastewater disposal; the presence of abandoned wells or vertical fault lines that can serve as pathways for fluid migration into aquifers; and standard operational industry norms (venting, flaring, blowdowns) that contribute to methane releases and air pollution.

Earlier scientific predictions are now bolstered by extensive empirical data, confirming that the public health risks from unconventional gas and oil extraction are real, the range of adverse environmental impacts wide, and the negative economic consequences considerable. **Our examination of the peer-reviewed medical, public health, biological, earth sciences, and engineering literature uncovered no evidence that fracking can be practiced in a manner that does not threaten human health.**

Despite this expanding body of knowledge, industry secrecy continues to thwart scientific inquiry, leaving many potential problems—especially cumulative, long-term risks—unidentified, unmonitored, and largely unexplored. This problem is compounded by non-disclosure agreements, sealed court records, and legal settlements that prevent families and their doctors from discussing injuries and illnesses that result from fracking and frack-related operations. Consequently, no quantitative and comprehensive inventory of human hazards yet exists.

The long-entrenched problem of secrecy shows no sign of resolving. The identity of chemicals used in fracking fluids remains proprietary and lies beyond the reach of federal right-to-know legislation that governs other industries. The nation's largest public database on chemicals used in fracking operations, FracFocus, operates on a voluntary basis, and while 23 states have adopted it to serve as a *de facto* chemical disclosure registry, its data has, over time, become increasingly less, rather than more, comprehensive and transparent. As documented in a 2016 study by a Harvard University team, rates of withheld information and claims of trade secrecy have increased since FracFocus was first launched in 2011. (See footnotes 1445, 1446.)

The incomplete picture created by lack of transparency in regard to chemicals used, produced, emitted, or created during the drilling and fracking process complicates the task of identifying potential hazards and exposure pathways. Nevertheless, the evidence to date indicates that fracking operations pose severe threats to health, both from water contamination and from air pollution.

In the United States, more than two billion gallons of water and fracking fluids are injected daily under high pressure into the earth for the purpose of enabling oil and gas extraction via fracking

or, after the fracking is finished, to flush the extracted wastewater down any of the more than 187,000 disposal wells across the country that accept oil and gas waste. All of that two billion daily gallons of fluid is toxic, and the wells that ferry it pass through our nation's groundwater aquifers on their way to the deep geological strata below, where the injection of fracking waste demonstrably raises the risk for earthquakes.

In the air around drilling and fracking operations and their attendant infrastructure, researchers have measured strikingly high levels of toxic pollutants, including the potent carcinogen benzene and the chemical precursors of ground-level ozone (smog). In some cases, concentrations of fracking-related air pollutants in communities where people live and work exceed federal safety standards. Research shows that air emissions from fracking can drift and pollute the air hundreds of miles downwind. (See footnotes 182-184.)

About one-third of the natural gas inventory in the United States is used to generate electricity, and, enabled by fracking, natural gas has, as of 2016, exceeded coal as the nation's leading source of electricity.<sup>44</sup> With hydraulically fractured wells now producing 70 percent of U.S. natural gas and half of U.S. crude oil, and with hydraulic fracturing used in 95 percent of new wells, the "unconventional" techniques of fracking can no longer be considered atypical nor can the question of their public health risks be considered inconsequential.<sup>45, 46</sup>

Drilling and fracking operations and their ancillary infrastructure have profoundly altered Earth's landscape. The flare stacks and artificial lights from major shale plays are visible from space,<sup>47</sup> as is the upward buckling of Earth's surface that is caused by the high-pressure injection of fracking wastewater into disposal wells.<sup>48</sup>

The dramatic increase in fracking over the last decade in the United States has pushed oil and gas extraction operations into heavily populated areas. In the Marcellus Shale alone, which underlies much of the Mid-Atlantic United States, 15,939 wells were drilled and fracked between 2008 and 2018.<sup>49</sup> More than 11,000 of these wells are in Pennsylvania.

At least six percent of the U.S. population—17.6 million Americans—now live within a mile of an active oil or gas well, a number that includes 1.4 million young children and 1.1 million

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<sup>44</sup> Magill, B. (2016, May 6). Fracking hits milestone as natural gas use rises in U.S. *Climate Central*. Retrieved from <http://www.climatecentral.org/news/fracking-milestone-as-natural-gas-use-rises-20330>

<sup>45</sup> U.S. Energy Information Administration. (2016, May 5). Hydraulically fractured wells provide two-thirds of U.S. natural gas production. *Today in Energy*. Retrieved from <https://www.eia.gov/todayinenergy/detail.php?id=26112>

<sup>46</sup> U.S. Energy Information Administration. (2016, March 15). Hydraulic fracturing accounts for about half of current U.S. crude oil production. *Today in Energy*. Retrieved from <https://www.eia.gov/todayinenergy/detail.php?id=26112>

<sup>47</sup> NASA Earth Observatory. (2016, March 23). Shale revolution: As clear as night and day. Retrieved from <http://earthobservatory.nasa.gov/IOTD/view.php?id=87725&src=eoai-iotd>

<sup>48</sup> Cogle, A. (2016, September 22). You can see fracking's impact on Earth's surface from space. *New Scientist*. Retrieved from <https://www.newscientist.com/article/2106886-you-can-see-frackings-impact-on-earths-surface-from-space/>

<sup>49</sup> Jacquet, J. B., Junod, A. N., Bugden, D., Wildermuth, G., Fergen, J. T., Jalbert, K., . . . Ladlee, J. (2018). A decade of Marcellus Shale: Impacts to people, policy and culture from 2008 to 2018 in the Greater Mid-Atlantic region of the United States. *Extractive Industries and Society*, 5(4), 596-609. doi: 10.1016/j.exis.2018.06.006

elderly people.<sup>50, 51</sup> About 8.6 million people are served by a drinking water source that is located within a mile from an unconventional well. (See footnote 302.) Understanding the potential for exposure and accompanying adverse impacts is a public health necessity.

## Emerging Trends

### 1) Regulations are simply not capable of preventing harm.

Studies reveal inherent problems in the natural gas and oil extraction process, such as well integrity failures caused by aging or the pressures of fracking itself, and in the waste disposal process. These issues lead to water contamination, greenhouse gas emissions, air pollution with carcinogens and other toxic chemicals, earthquakes, and a range of environmental and other stressors inflicted on communities.

Some of fracking's many component parts—which include the subterranean geological landscape itself—are simply not controllable.

Compounding the innate unpredictability of the fracking process: The number of wells and their attendant infrastructure continue to proliferate, creating burgeoning cumulative impacts, and the size of individual wells keep growing. With the horizontal portions of a single well now extending as far as two miles or more underground, fluid injections, once typically three to five million gallons per fracked well, now can easily reach 10 to 20 million gallons per well.

The injection of ever-increasing volumes of fluids into an ever-increasing number of wells creates significant deformations in the shale. These are translated upwards, a mile or more, to the surface. Along the way, these “pressure bulbs” can impact, in unpredictable ways, faults and fissures in the overlying rock strata, including strata that intersect fresh water aquifers. Such pressure bulbs may mobilize contaminants left over from previous drilling and mining activities. (See footnotes 370, 371.) No set of regulations can obviate these potential impacts to groundwater.

No set of regulations can eliminate earthquake risks. (See footnote 752.) In spite of growing knowledge about the mechanics of how fracking and the underground disposal of fracking waste trigger earthquakes via activation of faults, no model can predict where or when earthquakes will occur or how powerful they will be. New research demonstrates that induced earthquakes can occur many miles from fracking sites. (See footnote 73.)

Regulations cannot prevent air pollution. The state of California determined that fracking can have “significant and unavoidable” impacts on air quality, including driving pollutants to levels that violate air quality standards. (See footnote 173.) In northeastern Colorado, ambient levels of atmospheric hydrocarbons have continued to increase even with stricter emission standards. (See

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<sup>50</sup> Czolowski, E. D., Santoro, R. L., Srebotnjak, T., & Shonkoff, S. B. C. (2017). Toward consistent methodology to quantify populations in proximity to oil and gas development: A national spatial analysis and review. *Environmental Health Perspectives*, 125(8). doi: 10.1289/EHP1535

<sup>51</sup> Konkel, L. (2017). In the neighborhood of 18 million: Estimating how many people live near oil and gas wells. *Environmental Health Perspectives*, 125(8). doi: 10.1289/EHP2553

footnote 188.) Tighter state regulations and tougher enforcement, including unannounced visits by state health inspectors equipped with infrared cameras, have reduced leaking methane and toxic vapors at individual well sites, but total air emissions continue to rise as the total number of wells continues to increase. At this writing, there are 53,000 active oil and gas wells in Colorado.<sup>52</sup>

Leakage rates among active wells are wildly variable: Four percent of wells nationwide are responsible for fully half of all methane emissions from drilling and fracking-related activities. Predicting which wells will become “super-emitters” is not possible, according to a 2016 survey of 8,000 wells using helicopters and infrared cameras. Further, much of this leakage is engineered into the routine operation of fracking extraction, processing, and transport infrastructure, as when vapors are vented through release valves in order to regulate pressure. (See footnotes 994, 995.)

Long after they are decommissioned, well sites continue to leak in ways that are not always fixable. Abandoned wells are a significant source of methane leakage into the atmosphere, and, based on findings from New York and Pennsylvania, may exceed cumulative total leakage from oil and gas wells currently in production. Plugging abandoned wells does not always reduce methane emissions, and cement plugs themselves deteriorate over time. (See footnote 475.)

Further, countless abandoned wells are unmapped and their locations unknown. Many have no apparent owner. Across the nation, there are as many as three million abandoned wells. Pennsylvania alone is home to 200,000 to 750,000 abandoned wells, most of which are not charted or even visible on the surface.<sup>53</sup> No state or federal agency routinely monitors methane leakage from abandoned wells. (See footnotes 854, 859.) In Alberta, Canada, there are roughly 90,000 inactive wells in need of plugging, a number that is expected to double in the next eleven years. The Alberta Energy Regulator has estimated that the time required to plug and prepare 180,000 wells for clean-up and reclamation is 126 years. Another 77,000 wells in Alberta are plugged but not yet reclaimed.<sup>54</sup>

## **2) Fracking and natural gas are incompatible with climate solutions.**

On the grounds that natural gas emits, when combusted, only 53 percent of the carbon dioxide emitted by coal, early promoters of fracking argued that natural gas could serve as a “bridge fuel” while renewable energy sources ramp up. Scientific evidence now disproves these claims and shows that natural gas is as damaging to the climate as coal, and may be worse.

Natural gas is 85-95 percent methane, a short-lived but much more potent greenhouse gas than formerly appreciated. The Intergovernmental Panel on Climate Change estimates that, over a 20-

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<sup>52</sup> Finley, B. (2019, April 21). Colorado’s unannounced air-pollution inspections at oil and gas sites are showing results—yet emissions are up as production continues. *Denver Post*. Retrieved from <https://www.denverpost.com/2019/04/21/colorado-air-pollution-oil-gas-sites/>

<sup>53</sup> Lee, M. (2019, May 20). Millions of abandoned wells spark climate, safety fears. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060364121>

<sup>54</sup> Riley, S. J. (2019, April 8). Regulator projects Alberta’s inactive well problem will double in size by 2030, documents reveal. *The Narwhal*. Retrieved from <http://thenarwhal.ca/regulator-projects-albertas-inactive-well-problem-will-double-in-size-by-2030-documents-reveal/>

year time frame—longer than the dozen years remaining to limit global warming to 1.5° C—methane can, pound for pound, trap 86 times more heat than carbon dioxide. (See footnote 1045.)

Real-world methane leakage rates from drilling and fracking operations greatly exceed earlier estimates. Methane escapes into the atmosphere from all parts of the extraction, processing, and distribution system, all the way to the burner tip. In the heavily drilled Barnett Shale of northeastern Texas, methane emissions were shown to be 50 percent higher than the EPA had estimated. Fracking operations and associated infrastructure contributed 71-85 percent of the methane emissions in the region. A 2018 analysis of methane leaks from the U.S. oil and gas supply chain as a whole found leakage rates were 60 percent higher than reported by the EPA, and a 2019 study in southwestern Pennsylvania found shale gas emissions that were underreported by a factor of five when compared to EPA estimates. (See footnotes 944, 962.)

Much of the methane emitted from drilling and fracking activities and associated infrastructure originates not from accidental leaks but from purposeful losses that are inherent to the design of the industry's machinery or to normal operating use and are, therefore, not possible to mitigate. (See footnotes 1147-1149.) Methane is vented into the atmosphere during routine maintenance on compressor stations and pipelines; to create evaporative cooling for LNG storage and transport; during the flowback period after a well is fracked; and as an emergency procedure to control pressures. Inactive, abandoned wells are also significant methane emitters. Methane leakage at the levels now being documented, using multiple approaches in measurement and modeling, negates previously hypothesized benefits from burning methane instead of coal in most existing power plants.

Rising methane levels in the atmosphere make increasingly difficult the urgent task of limiting global warming to below levels called for in the Paris Agreement, which was based on older presumptions that global methane levels had plateaued. Instead, methane levels began to rise in 2007 and then shot up sharply in 2014.

At this writing, the cause of this ongoing methane surge is a subject of scientific debate. One hypothesis holds fossil fuel sources as the major driver. Another attributes the increase to biogenic sources, especially ruminant livestock. A third possibility is that rising global temperatures may be triggering methane release from wetlands, particularly in the southern tropics. Alternatively, the atmosphere's ability to break methane molecules apart may have become impaired, slowing the natural decay rate of methane.<sup>55</sup>

The fossil fuel hypothesis is supported by a major 2017 study led by NASA researchers using satellite measurements and isotopic analysis that can distinguish methane produced by microbes from methane emissions arising from oil and gas extraction. (See footnote 963.) Building on this research in a forthcoming study, Cornell University earth systems scientist Robert Howarth used isotopic analysis to identify shale gas and oil extraction as the source of at least one-third of total

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<sup>55</sup> Fletcher, S. E. M., & Shaefer, H. (2019). Rising methane: A new climate challenge. *Science*, 364(6444), 932-933. doi: 10.1126/science.aax1828

methane emissions, showing that the North American fracking boom is globally important in the current rise in global methane levels and “may well be the leading cause of the increased flux.”<sup>56</sup>

Climate researcher Euan Nisbet, who has called for a renewed emphasis on reducing methane emissions to combat climate change, notes that, whatever the relative contribution of its various sources, fossil fuel extraction represents a powerful lever for intervention. “If the increased methane burden is driven by increased emissions from natural sources, and if this is a climate feedback—the warming feeding the warming—then there is urgency to reduce anthropogenic emissions, which we can control.” Reducing methane emissions from fossil fuels is the highest priority because they are relatively large and “thus offer attractive targets for rapid reduction, which are essential if the Paris Agreement aims are to be attained.” (see footnote 952.)

### **3) Fracking and the disposal of fracking waste threaten drinking water.**

Cases of drinking water sources contaminated by drilling and fracking activities, or by associated waste disposal, are proven. Contamination occurs through three confirmed pathways: spills; discharge of fracking waste into rivers and streams; and underground migration of chemicals, including gas, into drinking water wells.

Methane and fracking-related contaminants can reach drinking water sources through cracks in well casings, through spaces between the casing and the wellbore, through naturally occurring fractures and fissures connecting shale layers with aquifers, and through abandoned wells. Methane migration into drinking water aquifers can change water chemistry in ways that mobilize metals or release hydrogen sulfide. (See footnote 248.)

Researchers working in Texas found 19 different fracking-related contaminants—including cancer-causing benzene—in hundreds of drinking water samples collected from the aquifer overlying the heavily drilled Barnett Shale, thereby documenting widespread water contamination. In Pennsylvania, a solvent used in fracking fluid was found in drinking water wells near drilling and fracking operations known to have well casing problems. In California, state regulators admitted that they had mistakenly allowed oil companies to inject drilling wastewater into aquifers containing clean, potable water. (See footnotes 352, 356, 360.) A 2017 study found that fracking wastewater discharged into rivers and streams through treatment plants created dozens of brominated and iodinated disinfection byproducts that are particularly toxic and “raise concerns regarding human health.” (See footnote 286.)

Fracking also threatens drinking water supplies through water depletion, especially in arid regions. According to a 2019 report, the volume of water used for fracking U.S. oil wells has more than doubled since 2016. (See footnote 245.) Oil and gas operations in the arid Permian Basin used eight times more water for fracking in 2018 as they did in 2011, threatening groundwater supplies. (See footnote 17.) In Arkansas, researchers found that water withdrawals for fracking operations deplete streams used for drinking water and recreation.

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<sup>56</sup> Howarth, R. W. (2019). Is shale gas a major driver of recent increase in global atmospheric methane? *Biogeosciences*. Manuscript under review. doi: 10.5194/bg-2019-131

With increasing volumes of wastewater now exceeding the storage capacity for underground injection wells—and with underground injection linked to earthquake risk—Texas, Colorado, and New Mexico are now petitioning the EPA to allow release of fracking wastewater into rivers and streams and to allow its use for irrigation and watering livestock. These practices further imperil drinking water sources.<sup>57</sup>

The trend toward mega-fracking, with longer and more extensive horizontal wellbores per well pad, coupled with the ongoing proliferation in the number of wells, has pushed the demand for water use in fracking operations ever higher, exacerbating both the problem of drinking water depletion and the problem of how to dispose of ever-increasing amounts of toxic fracking wastewater. A 2018 study found that water used for U.S. fracking operations increased by 770 percent per well between 2011 and 2016, while the amount of wastewater generated increased by 1,440 percent. (See footnote 259.)

As we went to press, a new study in Pennsylvania shows that, of the wastewater that remains in-state, 52 percent is reused in additional extraction operations, a practice that further concentrates chemical contaminants, including radioactive substances. The final destination for 35 percent of the total volume of liquid oil and gas waste generated in Pennsylvania from 1991-2017 is unknown because of gaps in reporting systems.<sup>58</sup>

#### **4) Drilling and fracking contribute to toxic air pollution and ground-level ozone at levels known to have health impacts.**

More than 200 airborne chemical contaminants have been detected near drilling and fracking sites. Of these, 61 are classified as hazardous air pollutants, including carcinogens; 26 are endocrine-disrupting compounds that have been linked to reproductive, developmental, and neurological damage. (See footnotes 134, 146.) Drilling and fracking operations emit fine particles and vapors that combine to create ground-level ozone (smog). Exposure to these pollutants is known to cause premature death, exacerbate asthma, and contribute to poor birth outcomes and increased rates of hospitalization and emergency room visits.

Of the lower 48 states, six states (Texas, Oklahoma, Colorado, North Dakota, West Virginia, and Pennsylvania) produce nearly 70 percent of the nation's natural gas and over 74 percent of onshore crude oil. These six states experience the highest levels of ground-level ozone and fine particle pollution attributable to oil and gas extraction activities.

Volatile organic compounds (VOCs) from drilling and fracking operations, together with nitrogen oxides, are responsible for 17 percent of locally produced ozone in Colorado's heavily drilled Front Range. (See footnote 160.) Colorado has exceeded federal ozone limits for the past decade, a period that corresponds to a boom in oil and gas drilling (See footnote 158.) Air

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<sup>57</sup> Lee, M. (2018, December 20). Oil patch states want authority for wastewater solutions. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060110201>

<sup>58</sup> Hill, L. A. L., Czolowski, E. D., DiGiulio, D., & Shonkoff, S. B. C. (2019). Temporal and spatial trends of conventional and unconventional oil and gas waste management in Pennsylvania, 1991-2017. *Science of the Total Environment*, 674, 623-636. doi: 10.1016/j.scitotenv.2019.03.475



pollution near drilling and fracking operations is high enough in some Colorado communities to raise cancer risks, according to a 2018 study. (See footnote 145.)

Living near drilling and fracking operations significantly increases asthma attacks for residents of Pennsylvania. Those living near active gas wells are 1.5-4 times more likely to suffer from asthma attacks than those living farther away, with the closest group having the highest risk. (See footnotes 636, 637.)

In California, fracking occurs disproportionately in areas already suffering from serious air quality problems and can drive ozone and other federally regulated air pollutants to levels that violate air quality standards. (See footnotes 172, 173.) This increased air pollution and smog formation poses a serious risk to all those already suffering from respiratory issues, such as children with asthma. With an average of 203 high-ozone days a year, intensely fracked Kern County, California, is the fifth-most ozone-polluted county in the nation, according to the American Lung Association.

Several studies have documented a sharp uptick in atmospheric ethane, a gas that co-occurs with methane and whose presence is attributable to emissions from oil and gas wells. This trend reverses a previous, decades-long decline. Ethane is a potent precursor to ground-level ozone (See footnote 162-164.)

The United States leads the world in the number of drill site flaring operations. Flares are used to control pressure but, more frequently, to burn off natural gas as waste during oil drilling in places that lack infrastructure for gas capture and transport. The ongoing boom in domestic oil production enabled by fracking has caused natural gas flaring to proliferate. Emissions from flare stacks contribute to ozone creation and include several carcinogens, notably benzene and formaldehyde. Flaring also releases carbon monoxide, soot, and toxic heavy metals. In 2016, the EPA acknowledged that it had dramatically underestimated health-damaging air pollutants from flaring operations. (See footnotes 156, 157.) A 2017 study of plume samples from gas flares in North Dakota found that incomplete combustion from flaring is responsible for 20 percent of the total emissions of methane and ethane from the Bakken shale fields—more than double the expected value. (See footnote 152.) Results of a 2019 study of flaring in the Eagle Ford Shale region of Texas suggest that flaring may be a significant environmental exposure in counties where flare stacks are concentrated. (See footnote 137.)

## **5) Public health problems associated with drilling and fracking include poor birth outcomes, reproductive and respiratory impacts, and cancer risks.**

Poor pregnancy outcomes and exacerbation of asthma have been linked to fracking activities in multiple studies in multiple locations using a variety of methodologies. (See footnote 1410.)

Studies of mothers living near oil and gas extraction operations consistently find impairments to infant health, including elevated risks for low birth weight and preterm birth. A 2017 study that examined birth certificates for all 1.1 million infants born in Pennsylvania between 2004-2013 found indicators of poorer infant health and significantly lower birth weights among babies born to mothers living near fracking sites. A 2015 Pennsylvania study found a 40 percent increase in the risk of preterm birth among infants born to mothers who lived nearby active drilling and

fracking sites, while a 2014 Colorado study found elevated incidence of neural tube defects and congenital heart defects. New studies in Texas and Colorado likewise found associations with infant deaths, high-risk pregnancies, and low birth weight. A 2017 pilot study in British Columbia found elevated levels of muconic acid—a marker of benzene exposure—in the urine of pregnant women living near fracking sites. (See footnotes 625, 627, 642, 664.)

As we went to press, a new pilot study reported elevated levels of barium and strontium in urine and hair samples of indigenous women living in an area of intense fracking activity in northeastern British Columbia. These trace metals, known to be released during hydraulic fracturing, are known developmental toxicants.<sup>59</sup>

An emerging body of evidence, from both human and animal studies, shows harm to fertility and reproductive success from exposure to oil and gas operations, at least some of which may be linked to the dozens of known endocrine-disrupting chemicals used in hydraulic fracturing. (See footnotes 642, 1438, 1443, 1444.)

Other documented adverse health indicators among residents living near drilling and fracking operations variously include exacerbation of asthma as well as increased rates of hospitalization, ambulance runs, emergency room visits, self-reported respiratory problems and rashes, motor vehicle fatalities, trauma, drug abuse, and gonorrhea. Pennsylvania residents with the highest exposure to active fracked gas wells were nearly twice as likely to experience a combination of migraine headaches, chronic nasal and sinus symptoms, and severe fatigue. (See footnote 634.)

A 2017 Colorado study found higher rates of leukemia among children and young adults living in areas dense with oil and gas wells, while a Yale University research team reported that carcinogens involved in fracking operations had the potential to contaminate both air and water in nearby communities in ways that may increase the risk of childhood leukemia. The Yale team identified 55 known or possible carcinogens that are known to be used in fracking operations and that may be released into the air and water. Of these, 20 are linked to leukemia or lymphoma. (See footnotes 632, 1424.)

As we went to press, the *Pittsburgh Post-Gazette* documented 27 cases of Ewing’s sarcoma, a rare bone cancer that tends to strike young people, in four counties in southwestern Pennsylvania that are at the center of the Marcellus Shale fracking boom.<sup>60</sup> Six cases occurred in the same school district. (The typical rate is 250 cases of Ewing’s sarcoma per year in the United States as a whole. The cancer has no known cause.) There are also high numbers of other childhood cancers in the region, which is home to several polluting legacy industries. The Pennsylvania Department of Health reported “no conclusive findings” of a cancer cluster in the Canon-

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<sup>59</sup> Caron-Beaudoin, É., Bouchard, M., Wendling, G., Barroso, A., Bouchard, M. F., Ayotte, P., . . . Verner, M. A. (2019). Urinary and hair concentrations of trace metals in pregnant women from Northeastern British Columbia: A pilot study. *Journal of Exposure Science & Environmental Epidemiology*. Advance online publication. doi: 10.1038/s41370-019-0144-3

<sup>60</sup> Templeton, D., & Hopey, D. (2019, May 14). Are the 27 cases of Ewing’s sarcoma near Pittsburgh a cluster? *Pittsburgh Post-Gazette*. Retrieved from <https://newsinteractive.post-gazette.com/blog/ewing-sarcoma-cancer-cluster-pittsburgh-washington-westmoreland/>

McMillan School District and Washington County, but as additional cases have come to light, calls for more comprehensive investigations are ongoing.<sup>61, 62, 63, 64, 65</sup>

## **6) Occupational health and safety risks for workers are severe and include both physical and chemical hazards.**

Drilling and fracking operations are exempt from federal Occupational Safety and Health Administration (OSHA) standards designed to prevent catastrophic releases of toxic, flammable, or explosive chemicals in workplaces. They are also exempt from OSHA rules written for the construction industry designed to prevent falls and other accidents on the job. Although announced by the agency as forthcoming in 1983, federal safety regulations for the oil and gas industry have never materialized.<sup>66, 67</sup> Instead, inspectors can only apply the “general duty clause” which is widely recognized as grossly inadequate for an industry with unique hazards and a fatality rate far above the national average. Fatality rate data for the oil and gas industry are limited, but available data in the seven years leading up to 2015 show fatality rates in oil and gas extraction that are four to seven times the national fatality rate. In 2017, the most recent year for which data are available, 81 oil and gas extraction workers died on the job, accounting for 72 percent of the fatal work injuries in the mining sector, which overall has a fatality rate nearly four times the national average.<sup>68, 69</sup>

Studies in specific states, as well as some national studies, have provided additional details on regional rates and circumstances of injuries and deaths. Fatality rates among workers in the oil and gas extraction sector in North Dakota were seven times the national fatality rates in this industry, which itself has more deaths from fires and explosions than any other private industry.

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<sup>61</sup> Templeton, D., & Hopey, D. (2019, March 28). CDC, state officials investigating multiple cases of rare cancer in southwestern Pa. *Pittsburgh Post-Gazette*. Retrieved from <https://www.post-gazette.com/news/health/2019/03/28/Ewing-sarcoma-Washington-Westmoreland-cancer-Canon-McMillan-school-cecil-pennsylvania/stories/201903280010>

<sup>62</sup> Templeton, D. (2019, April 23). No Ewing sarcoma cluster in the Canon-McMillan School District, state says. *Pittsburgh Post-Gazette*. Retrieved from <https://www.post-gazette.com/news/health/2019/04/23/Ewing-sarcoma-cluster-Canon-McMillan-Pennsylvania-Health-Department/stories/201904230128>

<sup>63</sup> Schiller, M. (2019, April 24). Families affected by rare cancer demand answers after Pa. health dept. investigation results in “no conclusive findings.” *KDKA2, CBS Pittsburgh*. Retrieved from <https://pittsburgh.cbslocal.com/2019/04/24/families-demand-answers-pa-health-dept-cancer-cluster-findings/>

<sup>64</sup> Templeton D., & Hopey, D. (2019, May 14). The human toll—risk and exposure in the gas lands. *Pittsburgh Post-Gazette*. Retrieved from <https://newsinteractive.post-gazette.com/blog/childhood-cancer-pittsburgh-pennsylvania-canon-mcmillan-pollution/>

<sup>65</sup> Editorial Board (2019, May 22). Young lives at stake: Rural areas deserve answers on child cancers. *Pittsburgh Post-Gazette*. Retrieved from Young lives at stake: rural areas deserve answers on child cancers

<sup>66</sup> Jones, C. (2018, February 3). OSHA standards moot in Quinton rig explosion because of exemption for oil-and-gas industry. *Tulsa World*. Retrieved from [http://www.tulsaworld.com/news/state/osha-standards-moot-in-quinton-rig-explosion-because-of-exemption/article\\_162d0efa-7860-5f4b-b982-ebdeb142c075.html](http://www.tulsaworld.com/news/state/osha-standards-moot-in-quinton-rig-explosion-because-of-exemption/article_162d0efa-7860-5f4b-b982-ebdeb142c075.html)

<sup>67</sup> Lee, M. (2019, June 13). Feds: Deadliest drilling accident in a decade ‘preventable.’ *E&E News*. Retrieved from <https://www.eenews.net/stories/1060564501>

<sup>68</sup> AFL-CIO. (2019). *Death on the job: The toll of neglect*. 28<sup>th</sup> Edition, Retrieved from [https://aflcio.org/sites/default/files/2019-05/DOTJ2019Fnb\\_1.pdf](https://aflcio.org/sites/default/files/2019-05/DOTJ2019Fnb_1.pdf)

<sup>69</sup> Bureau of Labor Statistics. (2018). *Injuries, illnesses, and fatalities*. U.S. Department of Labor. Retrieved from <https://www.bls.gov/iif/oshwc/foi/foi-chart-data-2017.htm>

An increase in workplace deaths likewise accompanied the initial fracking boom period in West Virginia.

Between 2011 and 2016, at least 60 workers at oil and gas drilling sites in Oklahoma were killed on the job. In January 2018, a natural gas rig exploded in southeastern Oklahoma, killing five workers when natural gas exploded during the drilling process. A “factual update” issued in August 2018 as part of an ongoing investigation by the U.S. Chemical Safety Board (CSB), determined that a piece of safety equipment was unable to fully close on the day of the accident and that other safety corners had been cut (See footnotes 532, 533, 537.) As we went to press, the CSB, released the final report on the accident, emphasizing that, in fact, two preventive barriers designed to prevent uncontrolled gas blowouts had failed as a consequence of significant lapses in safety protocols. Warning alarms did not sound. All five workers who died were trapped inside the driller’s cabin when fire blocked both exit doors. This problem, inherent to the design of the cabin, is not exceptional. The CSB investigation found that “there is no guidance to ensure that an emergency evacuation option is present onboard these rigs or can protect workers in the driller’s cabin from fire hazards.”<sup>70, 71</sup>

Pipeline construction workers also suffer elevated rates of injuries and fatalities, dying on the job 3.5 times more than workers in other industries.

All together, according to a 2018 investigation, 1,566 U.S. workers in the oil and gas drilling industry died from on-the-job injuries in the decade between 2008 and 2017.

A University of Tennessee study assessed the occupational inhalation risks from the hazardous and carcinogenic air pollutants emitted from various sources around fracking wells and found that chemical storage tanks presented the highest cancer risk. Benzene has been detected in the urine of wellpad workers in Colorado and Wyoming. The National Institute for Occupational Safety and Health named oil and gas extraction industry workers among those at risk for silicosis, an incurable lung disease caused by exposure to silica dust, from the silica sand that is used extensively in fracking operations. (See footnotes 548, 586, 594.)

## **7) Earthquakes are a proven consequence of both fracking and the underground injection of fracking waste.**

Injection of fracking wastewater into underground disposal wells is a known trigger of earthquake swarms in multiple locations, as demonstrated by several major studies, using different methodologies. Newer research in Canada, Oklahoma, and China links the practice of fracking itself to earthquakes, including some that take place many miles from well sites and

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<sup>70</sup> U.S. Chemical Safety and Hazard Investigation Board. (2019, June 12). *Gas blowout and fire at Pryor Trust Well IH-9*. Investigation Report No. 2018-01-I-OK. Retrieved from Pryor\_Trust\_Report\_FINAL\_FOR\_PUBLICATION.pdf

<sup>71</sup> U.S. Chemical Safety and Hazard Investigation Board (2019, June 12). CBS issues final report into fatal gas well blowout [Press release]. Retrieved from <https://www.csb.gov/csb-issues-final-report-into-fatal-gas-well-blowout/>

many years later, suggesting that seismic risks have been previously underestimated with much larger areas at risk and for longer periods of time.<sup>72, 73</sup>

A 2017 study of the Fort Worth Basin showed that a recent swarm of small earthquakes in northern Texas was originating in long-inactive fault lines in deep formations where fracking wastewater was being injected. Human activity is the only plausible explanation. (See footnote 499.) Another study using satellite-based radar imagery provided proof that the migration of fracking wastewater into faults increased pressures in ways that triggered a 4.8-magnitude earthquake in east Texas in 2012, while a third study documented the rupture of a fault plane that set off a 4.9-magnitude earthquake in Kansas in 2014 immediately following a rapid increase in fracking wastewater injection nearby. (See footnotes 747, 748.)

The number of earthquakes of magnitude 3.0 or higher skyrocketed in Oklahoma starting with the advent of the fracking boom—with fewer than two per year before 2009 and more than 900 in 2015. The 5.8 earthquake that struck near Pawnee on September 3, 2016 was the strongest in Oklahoma’s history and prompted an order from state regulators to shut down 67 wastewater disposal wells in the area. (See footnotes 745, 746.) In October 2016, the EPA recommended a moratorium on the underground injection of fracking wastewater in certain earthquake-prone parts of Oklahoma because regulations had not solved the problem. (See footnote 743.) Earthquake frequency began to decline in the state in 2017. In February 2018, after a new cluster of earthquakes, the state further restricted fracking activities.<sup>74</sup>

There is no evidence that fracking-induced earthquakes can be prevented solely by limiting the rate or volume of injected fluid. A 2018 analysis of shale basins across the United States found that shallower disposal wells can help lower the risk of earthquakes. However, injection of fracking waste into shallow formations increases the risk of groundwater contamination. (See footnote 707.)

In China’s Sichuan Province, a series of recent earthquakes have been linked to fracking, including one in December 2018 with a magnitude of 5.7, the largest fracking-induced earthquake to date. The likely cause was reactivation of unmapped faults by underground fluid pressure.<sup>75</sup> In February 2019, three additional earthquakes, all with a magnitude of over four, struck Sichuan Basin, killing two people, injuring 13, and damaging 20,000 homes. The government temporarily suspended fracking operations in the area.<sup>76</sup>

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<sup>72</sup> Bhattacharya, P., & Viesca, R. C. (2019). Fluid-induced aseismic fault slip outpaces pore-fluid migration. *Science*, 364(6439), 464-468. doi: 10.1126/science.aaw7354

<sup>73</sup> Foulger, G. (2019, May 14). Fracking can cause earthquakes a long way from its site. *Cosmos*. Retrieved from <https://cosmosmagazine.com/geoscience/fracking-can-cause-earthquakes-a-long-way-from-its-site>

<sup>74</sup> Wethe, D. (2018, February 28). Oklahoma toughens oil fracking rules after shale earthquakes. *Bloomberg*. Retrieved from <https://www.bloomberg.com/news/articles/2018-02-27/oklahoma-toughens-oil-fracking-rules-as-shale-earthquakes-climb>

<sup>75</sup> Lei, X., Wang, Z., & Su, J. (2019). The December 2018 M<sub>L</sub> 5.7 and January 2019 M<sub>L</sub> 5.3 earthquakes in south Sichuan Basin induced by shale gas hydraulic fracturing. *Seismological Research Letters*, 90(3), 1099-1110. doi: 10.1785/0220190029

<sup>76</sup> Myers, S.L. (2019, March 8). China experiences a fracking boom, and all the problems that go with it. *New York Times*. <https://www.nytimes.com/2019/03/08/world/asia/china-shale-gas-fracking.html>

## 8) Fracking infrastructure poses serious potential exposure risks to those living nearby.

Drilling and fracking activities are relatively short-term operations, but compressor stations are semi-permanent facilities that pollute the air 24 hours a day as long as gas is flowing through pipelines. Day-to-day emissions from compressor stations are subject to highly episodic variations due to pressure changes and maintenance-related deliberate releases and can create periods of potentially extreme exposures. Compressor stations generally have shorter emissions stacks than other polluting facilities such as power plants, which means their harmful emissions are more concentrated at ground level than if released from a greater height. As we went to press, a new study of air emissions from 74 compressor stations in New York State found 39 chemicals known to be human carcinogens and documented large releases of greenhouse gases.<sup>77</sup>

Because of their high pressures, compressor station explosions can have catastrophic consequences. On January 30, 2019, a compressor station in rural Michigan malfunctioned during a period of extreme cold and released a large amount of methane gas that ignited and exploded. On May 13, 2019, Boston-area physicians released a report detailing safety-related risks at a proposed natural gas compressor station in Weymouth, Massachusetts. In a worst case scenario explosion, injuries could extend for thousands of feet into densely populated residential neighborhoods, ignite a nearby industrial diesel fuel storage tank, and kill motorists driving on an adjacent highway.<sup>78</sup>

Pipelines themselves can freeze, corrode, break, and leak. Low-pressure flow lines alone are responsible for more than 7,000 spills and leaks since 2009. (See footnote 1120.)

Significant pipeline accidents happen roughly 300 times each year in the United States and, between 1998 and 2017, killed 299 people and injured 1,190 others, according to the Pipeline and Hazardous Materials Safety Administration (PHMSA). In May 2019, PHMSA sent a warning to pipeline operators about increased risks of leaks and explosions caused by more frequent flooding, sinkholes, and severe rainfall patterns in the eastern United States.<sup>79</sup> In September 2018, heavy rains and landslides triggered the explosion of a pipeline in Beaver County, Pennsylvania, destroying a house.<sup>80</sup> All together, landslides have caused six pipeline explosions in the Appalachian region since early 2018.<sup>81</sup>

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<sup>77</sup> Russo, P. N., & Carpenter, D. O. (2019). Air emissions from natural gas facilities in New York State. *International Journal of Environmental Research and Public Health*, 16(9), E1591. doi: 10.3390/ijerph16091591

<sup>78</sup> Baker, A., Bivens, M., Clapp, R., LaRocque, R., & Lundberg, B. (2019, May 13). Flammable, high-pressure industry in a populated coastal flood zone? Public safety and emergency response aspects of a proposed methane gas compressor in Weymouth. Greater Boston Physicians for Social Responsibility. Retrieved from <https://www.psr.org/blog/resource/flammable-high-pressure-industry-in-a-populated-coastal-flood-zone/>

<sup>79</sup> Pipeline Hazardous Materials Safety Administration. (2019, May 2). Pipeline safety: Potential for damage to pipeline facilities caused by earth movement and other geological hazards. *Federal Register*. Retrieved from <https://www.federalregister.gov/documents/2019/05/02/2019-08984/pipeline-safety-potential-for-damage-to-pipeline-facilities-caused-by-earth-movement-and-other>

<sup>80</sup> Phillips, S. (2019, May 21). Federal pipeline safety regulators issue warning on floods and subsidence. *StateImpact Pennsylvania*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2019/05/21/federal-pipeline-safety-regulators-issue-warning-on-floods-and-subsidence/>

<sup>81</sup> Soraghan, M. (2019, June 4). Landslides, explosions spark fear in pipeline country. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060472727>

Gas-fired power plants are major emitters of carbon monoxide and nitrogen oxides, which contribute to smog.

In the Upper Midwest, Wisconsin residents living near silica sand mining operations that service the fracking industry reported dust exposure and respiratory problems. Silica dust is a known cause of silicosis and lung cancer. West Texas is also experiencing a fracking sand boom where roughly 20 new sand mines have opened since July 2017. (See footnote 17.)

Fracking infrastructure in the United States also includes 400 underground gas storage facilities in 31 states, with aging equipment and scant federal oversight. The four-month leak at the nation's fifth largest facility, Aliso Canyon in southern California, between October 2015 and February 2016 resulted in exposures of a large suburban population to an uncontrollable array of chemicals. With a release of nearly 100,000 metric tons of methane, it became the worst methane leak in U.S. history. (See footnote 1185.)

The Aliso Canyon blow-out exposed residents in the region to benzene spikes, high ongoing odorant releases, hydrogen sulfide at levels far above average urban levels, and many other contaminants of concern. More than 8,300 households were evacuated and relocated, with residents reporting multiple symptoms, including headaches, nosebleeds, eye irritation, and nausea. In May 2019, state investigators announced that the cause of the massive leak at Aliso Canyon was rupture of a well casing caused by microbial corrosion within a well that had been originally drilled in 1954. Over the years, the casing had come in contact with groundwater.<sup>82</sup> The report also faulted the operator, SoCalGas, for failure to monitor and investigate more than 60 previous leaks at the gas storage complex.<sup>83</sup>

In a 2018 analysis of the safety risks of all 14 facilities in California that store gas in depleted oil fields, the California Council of Science and Technology found that gas companies do not disclose the chemicals they are pumping underground nor do state regulators possess the necessary information to assess risks. Further, many wells servicing the storage fields are 60 to 90 years old with no regulatory limit to the age of the well. (See footnote 1178.)

LNG facilities—and the pipelines, coastal terminals, and ships that service them—are a rapidly growing component of fracking infrastructure as the shale gas boom has allowed the United States to seek long-term supply contracts for natural gas exports. In July 2017, the United Kingdom received its first delivery of LNG from the Sabine Pass export terminal in Louisiana. The Cove Point LNG export facility in Maryland sent its first shipments of Marcellus Shale gas, destined for Japan and India, in spring 2018. The United States is now a top international seller of natural gas with LNG exports expected to double by the end of 2019. At this writing, three LNG export terminals are in operation in the United States with another 22 in construction or approved for construction.<sup>84, 85</sup>

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<sup>82</sup> Blade Energy Partners. (2019, May 16). *Root cause analysis of the uncontrolled hydrocarbon release from Aliso Canyon. SS-25*. California Public Utilities Commission. Retrieved from [ftp://ftp.cpuc.ca.gov/News\\_and\\_Outreach/SS-25%20RCA%20Final%20Report%20May%2016.%202019.pdf](ftp://ftp.cpuc.ca.gov/News_and_Outreach/SS-25%20RCA%20Final%20Report%20May%2016.%202019.pdf)

<sup>83</sup> Zaveri, M. (2019, May 17). Corroded well lining caused Aliso Canyon gas leak that displaced thousands, report says. *New York Times*. Retrieved from <https://www.nytimes.com/2019/05/17/business/porter-ranch-gas-leak.html>

<sup>84</sup> Federal Energy Regulatory Commission. (2018, October 23). North American LNG import/export terminals—existing. Retrieved from <https://www.ferc.gov/industries/gas/indus-act/lng/lng-existing.pdf>

LNG is purified methane in the form of a bubbling, super-cold liquid. It is created through the capital-intensive, energy-intensive process of cryogenics and relies on evaporative cooling to keep the methane chilled during transport. Explosive and with the ability to flash-freeze human flesh, LNG creates acute security and public safety risks. Its greenhouse gas emissions are 30 percent higher than conventional natural gas due to refrigeration, venting, leaks, and flaring, which is used to control pressure during regasification. The need to strip volatile impurities such as benzene from the gas prior to chilling it also makes LNG liquefaction plants a source of toxic air pollutants. (See footnotes 1226-1242.)

Cheniere Energy's Sabine Pass terminal in Louisiana became the subject of a federal investigation in January 2019 after a steel storage tank cracked and escaping LNG quickly vaporized into a flammable cloud. Another tank was found to be leaking gas from multiple places. PHMSA ordered both tanks shut down.<sup>86</sup>

In May 2019, the state of Oregon denied a Clean Water Act permit for the proposed Jordan Cove LNG export terminal, and the fracked gas pipeline that would serve it, over concerns about likely harm to streams, estuaries, and wetlands. This infrastructure project cannot be built without the state permit, but the company has reapplied.<sup>87</sup>

## **9) Drilling and fracking activities bring naturally occurring radioactive materials to the surface.**

Naturally occurring radioactive materials that occur in shale layers containing oil and natural gas are brought to the surface in the solid waste removed during drilling (drill cuttings) and in fracking wastewater. Radionuclides can also build up in pipes and equipment, and fracking itself can open pathways for the migration of radioactive materials. Exposure to increased radiation levels from fracking materials is a risk for both workers and residents.

Radon levels in Pennsylvania homes have risen since the advent of the fracking boom, and buildings in heavily drilled areas have significantly higher radon readings than areas without well pads—a discrepancy that did not exist before 2004. (See footnote 511.) As we went to press, a new study reported a similar pattern in Ohio.<sup>88</sup>

Also in Pennsylvania, a 2019 study measured levels of radium in drill cuttings that would exceed regulatory limits for disposal in landfills if drill cuttings were not exempt from federal regulations governing hazardous waste. Drill cuttings from Pennsylvania fracking operations are

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<sup>85</sup> U.S. Department of Energy (2018, November 26). Long term applications received by the DOE/FE to export domestically produced LNG from the lower 48 states. Retrieved from <https://www.energy.gov/sites/prod/files/2018/12/f58/Summary%20of%20LNG%20Export%20Applications.pdf>

<sup>86</sup> Mandel, J., & Zou, J. J. (2019, May 30). Leaks threaten safety—and success—of America's top natural gas exporter. *E&E News, Houston Chronicle*, and Center for Public Integrity. Retrieved from <https://publicintegrity.org/environment/leaks-threaten-safety-and-success-of-americas-top-natural-gas-exporter/>

<sup>87</sup> Oregon Department of Environmental Quality. (2019, May 6). DEQ issues a decision on Jordan Cove's application for 401 Water Quality Certification [Press statement]. Retrieved from <https://www.oregon.gov/newsroom/pages/NewsDetail.aspx?newsid=3273>

<sup>88</sup> Xu, Y., Sajia, M., & Kumar, A. (2019). Impact of the hydraulic fracturing on indoor radon concentrations in Ohio, a multilevel modeling approach. *Frontiers in Public Health*, 7, 76. doi: 10.3389/fpubh.2019.00076



routinely dumped in municipal waste landfills in Ohio and New York. (See footnote Swiedler, 2019.)

A variety of radioactive substances—including radium, thorium, and uranium—have been detected in fracking wastewater. A 2018 study in the Marcellus Shale region showed that extreme salinity, as well as the chemical composition of fracking fluid, interacts with the shale during the fracking process in ways that mobilize radium and make fracking wastewater radioactive. (See footnote 497.)

A 2018 simulation study of radium-226 in fracking wastewater from North Dakota’s Bakken Shale found potential risk to human health from fracking wastewater spills into surface water. (See footnote 500.)

## **10) Drilling and fracking activities harm wildlife through multiple pathways.**

Animals serve as sentinels for chemical exposures that may also affect human residents who share their environment. In addition, animals perform ecosystem services essential to human existence, as confirmed by a landmark United Nations report in May 2019.<sup>89</sup> For both reasons, harm to wildlife by fracking operations has consequences for public health.

Birds and other wildlife have been poisoned by fracking wastewater held in open pits, while spills and discharges of fracking waste have precipitated mass die-offs of fish, as documented in Ohio, Kentucky, and Pennsylvania. (See footnotes 406, 434.) Freshwater mussels, which are endangered throughout North America, accumulate contaminants, including strontium, when fracking wastewater is discharged through sewage treatment plants. (See footnote 255.)

Chemicals in fracking waste are toxic to, or otherwise disrupt development in, many fish and amphibian species. (See footnotes 246, 326.) In remote locations in Pennsylvania, streams once classified as high-quality brook trout habitat had no fish at all after the arrival of drilling and fracking operations. (See footnote 311.) Overall, aquatic habitats impacted by fracking activities show decreased biodiversity.

Wildlife is harmed by fracking through loss of food resources. Water fleas (*Daphnia spp.*), the basis of freshwater aquatic food chains, become unable to vertically navigate through water columns upon exposure to trace amounts of fracking fluid. (See footnote 241.) In West Virginia, populations of Louisiana Waterthrush, which rely on aquatic food sources, have declined in areas of drilling and fracking. (See footnote 247.)

Light and noise pollution from oil and gas production disrupt wildlife behavior, including in protected areas and critical habitats of endangered species, and have been linked to mass die-offs of waterfowl and declines in songbird populations in Alberta, Canada and New Mexico. (See footnotes 678, 693.) Chronic noise from drilling and fracking operations interferes with the ability of birds to respond to acoustic cues. (See footnotes 1111, 1112.)

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<sup>89</sup> IPBES. (2019, May 6). *Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services*. E. S. Brondizio, J. Settele, S. Díaz, & H. T. Ngo (eds). Advance unedited version. Bonn, Germany: IPBES Secretariat. Retrieved from [https://www.ipbes.net/system/tdf/spm\\_global\\_unedited\\_advance.pdf?file=1&type=node&id=35245](https://www.ipbes.net/system/tdf/spm_global_unedited_advance.pdf?file=1&type=node&id=35245)

Fracking harms wildlife through climate change and habitat destruction. Oil and gas infrastructure, including compressor stations, has caused declines in grassland songbirds in Canada. Sand mining operations in Texas are imperiling the dunes sagebrush lizard. The proposed route of the Atlantic Coast Pipeline cuts through critical habitat for four endangered species. A 2019 study found that forest disturbances driven by drilling and fracking activities are altering the abundance of songbird populations in central Appalachia, particularly harming species whose habitats are forest interiors.<sup>90</sup> Well pad construction hastens the spread of invasive non-native plant species which harms wildlife habitat. (See footnote 925.)

According to economists, the cost of wildlife habitat fragmentation due to fracking is \$3.5-4.45 billion. (See footnote 1276.)

### **11) The risks posed by fracking in California are unique.**

Hydraulic fracturing in California is practiced differently than in other states, making its risks different as well. Wells are more likely to be vertical rather than horizontal, and the oil-containing rock layer is shallower. Hence, much less water is used per well for fracking as compared to other states. However, the fracking fluid used is much more chemically concentrated, the fracking zones are located closer to overlying aquifers, and the risk of a fracture reaching groundwater is higher.

California is the only state that allows wastewater from oil fields to be held in unlined open pits, which creates risks for both air and groundwater contamination. As of July 2018, 1,086 such pits were operational in the Central Valley, with the vast majority in Kern County. An investigation by reporters for NBC Bay Area found additional pits not on the state's official list. In at least two instances, toxic wastewater from the pits had migrated underground for more than a mile.<sup>91</sup>

In 2014, the discovery that companies had, for years, been wrongly allowed to inject fracking waste directly into California's freshwater aquifers led to the closing of 175 disposal wells. Impacts on drinking water are unknown. (See footnotes 289, 290.)

Most new fracking operations in California take place in areas with a long history of oil extraction. A high density of old and abandoned wells provides potential leakage pathways, should fractures intersect with them. And although fracking requires considerably less water per well in California, it takes place disproportionately in areas of severe water shortages and can compete with municipal and agricultural needs for freshwater.

The combination of ongoing drought and lack of disposal options has resulted in the diversion of fracking wastewater to farmers for irrigation of crops, raising concerns about contaminated water potentially affecting food crops and draining into groundwater. Investigative reports in 2015

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<sup>90</sup> Farwell, L. S., Wood, P. B., Brown, D. J., & Sheehan, J. (2019). Proximity to unconventional shale gas infrastructure alters breeding bird abundance and distribution. *The Condor*. Advance online publication. doi: 10.1093/condor/duz020

<sup>91</sup> Stock, S., Campos, R., Horn, M., & Ettema, K. (2018, July 31). Toxic wastewater from oil fields endangers California's water supply, scientists tell NBC Bay Area. *NBC Bay Area*. Retrieved from <https://www.nbcbayarea.com/investigations/Toxic-WasteWater-From-Oil-Fields-Endangers-Californias-Water-Supply-Scientists-Tell-NBC-Bay-Area-483089841.html>

revealed that Chevron Corporation piped 21 million gallons of recycled oil and gas wastewater per day to farmers for crop irrigation. Tests showed the presence of several volatile organic compounds, including acetone, which is linked in lab studies to kidney, liver, and nerve damage. (See footnotes 924-926.)

These activities project fracking's impacts onto geographically distant populations, especially in cases where wastewater is used in crop irrigation and livestock watering. Food is a troubling possible exposure route to fracking chemicals, in part because so little is known about these chemicals. According to a hazard assessment of chemicals used in California oil drilling operations that reuse wastewater for livestock watering and other agricultural purposes, more than one-third of the 173 chemicals used are classified as trade secrets: Their identities are entirely unknown. Of the remainder, ten are likely carcinogens, 22 are toxic air contaminants, and 14 had no toxicity data available. Estimating risks to consumers of the food produced with wastewater irrigation is thus not possible. (See footnote 919.)

The other area in California where fracking is concentrated, the Los Angeles Basin, is located directly under one of the most populous cities in the world. As of 2018, there were 3,468 active and 1,850 inactive oil and gas wells in Los Angeles County. (LA Dept of Health 2018). At least 1.7 million people in Los Angeles live or work within one mile of an active oil or gas well. California does not currently limit how close to residences or schools drilling and fracking activities may be conducted. A 2017 study shows that many of the same chemicals used to stimulate wells during fracking operations are also used in urban oil wells located in densely populated areas of southern California. (See footnote 295.)

## **12) Fracking in Florida presents many unknowns.**

Gas and oil drilling in Florida, now only a minor industry, is currently concentrated in two areas: the western Panhandle near Pensacola and the Everglades area of southwest Florida. So far, fracking has been used at least once—in 2013 at a test well located in the Corkscrew Swamp Sanctuary near Naples in Collier County. The Texas company that fracked this well, using high-pressure acid fracturing techniques to dissolve the bedrock, received a cease and desist order from the Florida Department of Environmental Protection.<sup>92</sup>

Renewed interest in oil and gas exploration in Florida has prompted public debate about fracking and whether to promulgate state regulations or prohibit it outright, possibly including a ban on the use of acid-dissolving technologies in addition to hydraulic fracturing *per se*. Bills that sought to ban fracking but not matrix acidizing failed to pass in the Florida legislature in the 2019 legislative session.<sup>93</sup>

Florida has more available groundwater than any other state; it is the drinking water source for 93 percent of Florida's population. Groundwater is also pumped to irrigate crops and provide

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<sup>92</sup> Could leftover wastewater from balky oil well end up a health hazard? (2015, January 1). *Naples Daily News*. Retrieved from <http://archive.naplesnews.com/news/local/could-leftover-wastewater-from-balky-oil-well-end-up-a-health-hazard-ep-853723380-335781721.html/>

<sup>93</sup> Gross, S. J. (2019, April 17). Environmentalists cite report on Florida oil spills as bid to ban fracking stalls. *Miami Herald*. Retrieved from <https://www.miamiherald.com/news/local/environment/article229355974.html>

frost protection to winter crops. Most of this water is held in the Floridan Aquifer, which extends across the entire peninsula and into parts of Georgia, Alabama, and South Carolina. This aquifer provides drinking water to ten million people in both rural and urban communities, including residents of several major cities: Gainesville, Jacksonville, Orlando, Tallahassee, and Tampa. Overlain by smaller, shallower aquifers in southern Florida, it is a highly permeable, highly interconnected subterranean system, with water moving rapidly in multiple directions through massive shelves of limestone, which represent the dissolved shells and fossilized skeletons of prehistoric marine organisms. Honeycombed with pores, fissures, joints, and caves, the underground terrain of the Floridan Aquifer resembles a vast, brittle, sponge partly covered with sand and clay. Springs and sinkholes are common.<sup>94, 95</sup>

It is not known whether fracking in Florida could induce sinkholes to open up or whether alterations in underground pressures could cause springs to go dry. Certainly, Florida's porous geology makes it vulnerable to groundwater contamination. Crumbly, soluble limestone offers pathways for contaminants spilled on the surface to travel deep into the aquifer, where they can be dispersed over great distances by the aquifer's river-like currents. A 2003 experiment with a dye tracer showed the special susceptibility of Florida's groundwater to potential contamination; within a few hours, the red dye traveled through the aquifer a distance (330 feet) that researchers had presumed would take days.<sup>96</sup>

Compounding these risks, Florida's exposure to hurricanes makes it vulnerable to spills of fracking-related chemicals. In August 2017, flooding from Hurricane Harvey shut down fracking sites in Texas and triggered 31 separate spills at wells, storage tanks, and pipelines. (See footnotes 888-890.)

It is unclear where Florida would send any potential fracking wastewater for treatment and/or for underground injection. Florida currently injects other types of liquid waste into disposal wells that are located above, rather than below, oil- and gas-producing zones. The injection of fracking waste in these same shallower layers may make earthquakes less likely than, for example, in Oklahoma (where it is injected into deep formations), but it would also locate that waste closer to the aquifers, which are poorly mapped. To undertake the necessary study to determine how securely Florida's geological formations could contain wastewater from drilling and fracking operations and protect drinking water would be, in the words of two geophysicists, "a monumental task requiring full-time work...for decades."<sup>97</sup> There are reasons to be concerned. In

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<sup>94</sup> Johnson, R. H., & Bush, P. W. (2013, September 4). *Summary of the hydrology of the Floridan Aquifer System in Florida and in parts of Georgia, South Carolina, and Alabama*. U.S. Geological Survey Professional Paper 1403-A. Retrieved from <https://sofia.usgs.gov/publications/papers/pp1403a/>

<sup>95</sup> Tihansky, A. B., & Knochenmus, L. A. (2001, February 13). *Karst features and hydrogeology in west-central Florida*. U.S. Geological Survey Water-Resources Investigations Report 01-4011. Retrieved from [https://water.usgs.gov/ogw/karst/kigconference/abt\\_karstfeatures.htm](https://water.usgs.gov/ogw/karst/kigconference/abt_karstfeatures.htm)

<sup>96</sup> Miami-Dade County Wellfield Technical Work Group. (2017, July 31). *Final Report*. Retrieved from <http://ecmrer.miamidade.gov:8080/reports/WellfieldTechnicalWorkgroupReportJuly2017.pdf>

<sup>97</sup> Russo, R., & Screatton, E. (2016, May 9). Should Florida 'frack' its limestone for oil and gas? Two geophysicists weigh in. *University of Florida News*. Retrieved from <http://news.ufl.edu/articles/2016/05/should-florida-frack-its-limestone-for-oil-and-gas-two-geophysicists-weigh-in.php>

South Florida in the 1990s, 20 stringently regulated disposal wells failed and leaked sewage waste into the Upper Floridan Aquifer, a potential future source of drinking water for Miami.<sup>98</sup>

### **13) The economic instabilities of fracking exacerbate public health risks.**

Fracking is not a stable business. Although the fracking boom has lifted U.S. oil and gas production to all-time highs, shale wells drilled in the past five years are pumping significantly less oil and gas than their operators predicted to their investors. Because the production of individual shale wells falls precipitously over the course of a few years, operators must continue drilling new wells at an ever-swifter pace to maintain growth targets—even as owners are under pressure to cut costs in the face of price declines.

The result is lack of profits, dependency on Wall Street financing and low interest rates, and asset sell-offs throughout the fracking industry as a whole. (See footnote Olson, Wall St. J., Jan 2, 2019.) Between 2008 and 2018, leading fracking companies spent \$230 billion more than they earned, covering the gap with debt.<sup>99</sup>

Even as oil prices have rebounded somewhat during the past two years, fracking companies are, collectively, still spending more on drilling than they receive by selling oil and gas. By 2018, only five of the largest 20 fracking companies were making more cash than they spent, and the stock prices of all 29 shale producers fell.<sup>100, 101</sup>

These unstable economic fundamentals have multiple consequences for public health and safety as cumulative impacts mount from wells both old and new.

Pressures to cut costs incentivize cutbacks in safety measures and leave landscapes pock-marked by increasing numbers of hastily abandoned wells in need of remediation and long-term monitoring. Orphaned wells left behind by industry during energy price downturns or after bankruptcy are poorly monitored and, as conduits for gas and fluid leakage, become health and safety threats. Abandoned wells pose risks for soil and water contamination and can emit toxic air pollution and greenhouse gases. Some have exploded.<sup>102, 103, 104</sup>

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<sup>98</sup> Lustgarten, A. (2012, June 21). Injection wells: the poison beneath us. *ProPublica*. Retrieved from <https://www.propublica.org/article/injection-wells-the-poison-beneath-us>

<sup>99</sup> Crooks, E. (2018, March 4). Boom times for US shale oil producers. *Financial Times*. Retrieved from <https://www.ft.com/content/2c7f6a38-1d37-11e8-956a-43db76e69936>

<sup>100</sup> McLean, B. (2018, September 1). The next financial crisis lurks underground.” *New York Times*. Retrieved from <https://www.nytimes.com/2018/09/01/opinion/the-next-financial-crisis-lurks-underground.html>

<sup>101</sup> Hiller, J. (2019, April 2). Cash flow still weak at U.S. shale firms, stock prices underperform. *Reuters*. Retrieved from <https://www.reuters.com/article/usa-shale-finances/cash-flow-still-weak-at-u-s-shale-firms-stock-prices-underperform-idUSL1N211001>

<sup>102</sup> Zoffos, J. (2018, January 16). ‘Orphaned’ oil and gas wells are on the rise.” *High Country News*. Retrieved from <http://www.hcn.org/articles/energy-industry-orphaned-oil-and-gas-wells-are-on-the-rise>

<sup>103</sup> Cox, S. (2019 March 19). B.C. left holding massive bill for hundreds of orphan wells as frack companies go belly up. *The Narwhal*. Retrieved from <https://thenarwhal.ca/b-c-left-holding-massive-bill-for-hundreds-of-orphan-gas-wells-as-frack-companies-go-belly-up/>

In both North Dakota's Bakken Shale and western Texas' Permian Basin, cost-cutting pressures, coupled with a desperate rush to drill new oil wells to compensate for declining rates of production from older wells, have meant that waste natural gas generated as a byproduct of oil drilling is simply vented or flared rather than captured, in order to speed up the rate of oil drilling.<sup>105, 106</sup> By April 2019, the amount of natural gas burned off via flaring in the Permian oil fields had reached a record high and exceeded the amount of gas needed to power every residence in Texas.<sup>107</sup> Flaring, a leading source of toxic air pollution and smog, is a public health menace.<sup>108</sup>

Independent economic analyses also show that the promise of local job creation has been greatly exaggerated, with many jobs going to out-of-area workers. Reports show that oil and gas jobs increasingly will be lost to automation.

With the arrival of drilling and fracking operations, communities have experienced steep increases in rates of crime including sex trafficking, rape, assault, drunk driving, drug abuse, and violent victimization—all of which carry public health consequences, especially for women. Social costs include road damage, failed local businesses, loss of affordable rental housing, and strains on law enforcement and municipal services. School districts report increased stress. Economic analyses have found that drilling and fracking activities threaten property values and can diminish tax revenues for local governments. Additionally, drilling and fracking on private lands pose an inherent conflict with mortgages and property insurance due to the hazardous materials used and the associated risks.

#### **14) Fracking raises human rights and environmental justice issues.**

Inequalities in opportunities to participate in environmental decision-making and uneven impacts of environmental hazards along racial and socioeconomic lines are signature issues of environmental justice. In multiple regions where fracking is practiced, well pads and associated infrastructure are disproportionately sited in non-white, indigenous, or low-income communities.<sup>109, 110</sup>

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<sup>104</sup> Riley, S. J. (2019, April 3). Notley vs. Kenney on how to deal with Alberta's 167,000 inactive and abandoned oil and gas wells. *The Narwhal*. Retrieved from <https://thenarwhal.ca/notley-vs-kenney-on-how-to-deal-with-albertas-167000-inactive-and-abandoned-oil-and-gas-wells/>

<sup>105</sup> Ngai, C. (2018, October 9). Mind the drop: decline rates from maturing oil wells on the rise. *Bloomberg*. Retrieved from <https://www.bloombergquint.com/business/mind-the-drop-decline-rates-from-maturing-oil-wells-on-the-rise>

<sup>106</sup> Lee, M. (2019, May 8). Gas glut spurs near-record flaring across shale states. *E&E News*. Retrieved from <https://www.eenews.net/energywire/stories/1060292021>

<sup>107</sup> Hiller, J. (2019, June 4). Natural gas flaring hits record high in first quarter in U.S. Permian Basin. *Reuters*. Retrieved from <https://www.reuters.com/article/us-usa-shale-flaring/natural-gas-flaring-hits-record-high-in-first-quarter-in-us-permian-basin-idUSKCN1T5235>

<sup>108</sup> Crowley, K., & Collins, R. (2019, April 11). Oil producers are burning enough gas to power every home in Texas. *Bloomberg*. Retrieved from <https://www.bloomberg.com/news/articles/2019-04-10/permian-basin-is-flaring-more-gas-than-texas-residents-use-daily>

<sup>109</sup> Healy, N., Stephens, J. C., & Malin, S. A. (2019). Embodied energy injustices: Unveiling and politicizing the transboundary harms of fossil fuel extractivism and fossil fuel supply chains. *Energy Research & Social Science*, 48, 219-234. doi: 10.1016/j.erss.2018.09.016

A 2019 analysis of socio-demographic characteristics of people living close to drilling and fracking operations in the states of Colorado, Oklahoma, Pennsylvania, and Texas found strong evidence that minorities, especially African Americans, disproportionately live near fracking wells.<sup>111</sup>

Similarly, a pattern of racially biased permitting was documented in the heavily fracked Eagle Ford area of southern Texas where a public health research team showed that disposal wells for fracking wastewater were more than twice as common in areas where residents are more than 80 percent people of color than in majority white communities.<sup>112</sup> Since 2007, more than 1,000 waste disposal wells have been permitted in the Eagle Ford Shale region where groundwater is the primary source of drinking water.<sup>113</sup>

In intensely drilled Denton, Texas, a study found that those benefiting most from Denton's mineral wealth tended to live elsewhere, while the environmental burdens remained local and fell hardest on those who did not have a voice in mineral-leasing decisions. "Non-mineral owners are essentially excluded from the private decisions, as the mineral owners not only receive the direct monetary benefits, but also hold a great deal of state-sanctioned power to decide if and how [shale gas development] proceeds."<sup>114</sup>

Poor communities of color are disproportionately affected by drilling activities in California. Of Los Angeles residents living within a quarter-mile of a well, more than 90 percent are people of color. In November 2015, civic groups led by youth sued the city of Los Angeles for racial discrimination based on allegations of a preferential permitting process and unequal regulatory enforcement for oil wells located in neighborhoods of color. Together, these differential practices have resulted in a higher concentration of wells with fewer environmental protections in Black and Latino communities.<sup>115</sup> South Coast Air Quality Management District records show that oil drilling operations in Los Angeles neighborhoods released into the air 21 million pounds of toxic chemicals between June 2013 and February 2017. These emissions included crystalline silica, hydrofluoric acid, and formaldehyde.<sup>116</sup>

Across California, gas-fired power plants are disproportionately located in disadvantaged communities, as classified by an environmental justice screening tool developed by the state

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<sup>110</sup> Clough, E. (2018). Environmental justice and fracking: A review. *Current Opinion in Environmental Science & Health*, 3, 14-18. doi: 10.1016/coesh.2018.02.005

<sup>111</sup> Zwickl, K. (2019). The demographics of fracking: A spatial analysis for four U.S. states. *Ecological Economics*, 161, 202-215. doi: 10.1016/j.ecolecon.2019.02.001

<sup>112</sup> Johnston, J. E., Werder, E., & Sebastian, D. (2016). Wastewater disposal wells, fracking, and environmental justice in southern Texas. *American Journal of Public Health*, 106(3). doi: 10.2105/AJPH.2015.303000

<sup>113</sup> Bienkowski, B. (2016, February 3). Poor, minorities carry the burden of frack waste in South Texas. *Environmental Health News*. Retrieved from <http://www.environmentalhealthnews.org/ehs/news/2016/feb/fracking-waste-eagle-ford-texas-hispanic-environmental-justice>

<sup>114</sup> Fry, M., Briggie, A., & Kincaid, J. (2015). Fracking and environmental (in)justice in a Texas city. *Ecological Economics*, 117. doi: 10.1016/j.ecolecon.2015.06.012

<sup>115</sup> Reyes, E. A. (2015, November 6). Environmental advocates sue L.A., accusing it of "rubber stamping" oil drilling plans. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/lanow/la-me-ln-lawsuit-oil-drilling-20151106-story.html>

<sup>116</sup> Fleming, J. C., & Kim, C. (2017, December 13). Danger next door: The top 12 air toxics used for neighborhood oil drilling in Los Angeles. Center for Biological Diversity. Retrieved from <http://www.biologicaldiversity.org/publications/papers/DangerNextDoor.pdf>

Office of Environmental Health Hazard Assessment.<sup>117</sup> More than three-quarters of the 21,397 new oil wells drilled in California between 2011 and 2018 are located in low-income minority communities, according to state data.<sup>118</sup>

In Greeley, Colorado, a massive well pad housing 24 wells was sited near Bella Romera Academy, an elementary school in a low-income community where 82 percent of students are Latino, after earlier plans were scrapped for a site near a charter school where students are majority white and middle-class.<sup>119</sup>

In May 2018, community groups in North Carolina filed an environmental justice complaint against the Atlantic Coast Pipeline, alleging the project poses disproportionate risk of harm to people of color. Thirteen percent of those living along the pipeline route are Native Americans in a state where Native Americans make up only 1.2 percent of the population.<sup>120, 121</sup> A compressor station in Virginia that would service this pipeline is located in a historically African-American community.<sup>122</sup>

In Pennsylvania, evidence shows that gas-fired power plants are disproportionately located in low-income and minority communities.<sup>123</sup> A geographic study found a higher concentration of drilling and fracking operations in impoverished communities throughout the state of Pennsylvania as well as in localized areas of West Virginia, but it did not find differences with respect to race. “The results demonstrate that the environmental injustice occurs in areas with unconventional wells in Pennsylvania with respect to the poor population.”<sup>124</sup> These findings are supported by census tract data in western Pennsylvania showing that among nearly 800 gas wells, only two were drilled in communities where home values exceeded \$200,000.<sup>125</sup>

Similarly, in Ohio, geographic evidence reveals that disposal wells for fracking wastewater are

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<sup>117</sup> PSE Healthy Energy. (2017, April). *Natural gas power plants in California’s disadvantaged communities*. Retrieved from [https://www.psehealthyenergy.org/wp-content/uploads/2017/04/CA.EJ\\_Gas\\_Plants.pdf](https://www.psehealthyenergy.org/wp-content/uploads/2017/04/CA.EJ_Gas_Plants.pdf)

<sup>118</sup> Center for Biological Diversity (2018, August 16). Analysis: Most oil wells approved by Gov. Brown are in low-income areas, communities of color [Press statement]. Retrieved from [https://www.biologicaldiversity.org/news/press\\_releases/2018/california-oil-drilling-08-16-2018.php](https://www.biologicaldiversity.org/news/press_releases/2018/california-oil-drilling-08-16-2018.php)

<sup>119</sup> Turkewitz, J. (2018, May 31). In Colorado a fracking boom and a population explosion collide. *New York Times*. Retrieved from <https://www.nytimes.com/2018/05/31/us/colorado-fracking-debates.html>

<sup>120</sup> McKenna, P. (2018, May 18). Atlantic Coast Pipeline faces civil rights complaint after key permit is blocked. *Inside Climate News*. Retrieved from <https://insideclimatenews.org/news/18052018/atlantic-coast-pipeline-natural-gas-civil-rights-environmental-justice-epa>

<sup>121</sup> Emmanuel, R. E. (2017). Flawed environmental justice analysis. *Science*, 375(6348), 260. doi: 10.1126/science/aao2684

<sup>122</sup> Finley-Brook, M., Williams, T. L., Caron-Sheppard, J. A., & Jaromin, M. K. (2018). Critical energy justice in U.S. natural gas infrastructuring. *Energy Research & Social Sciences*, 41, 176-190. doi: 10.1016/j.erss.2018.04.019

<sup>123</sup> Nextgen Climate America, & PSE Healthy Energy. (2018). Our air: Health and equity impacts of Pennsylvania’s power plants. Retrieved from <https://nextgenpolicy.org/wp-content/uploads/2016/07/NGCA-PSE-Our-Air-Health-and-Equity-Impacts-PA-2016-0710-2.pdf>

<sup>124</sup> Ogneva-Himmelberger, Y., & Huang, L. (2015). Spatial distribution of unconventional gas wells and human populations in the Marcellus Shale in the United States: Vulnerability analysis. *Applied Geography*, 60, 165-174. doi: 10.1016/j.apgeog.2015.03.011

<sup>125</sup> Frazier, R. (2016, June 30). Is fracking an environmental justice issue? *The Allegheny Front*. Retrieved from <https://www.alleghenyfront.org/is-fracking-an-environmental-justice-issue/>



disproportionately located in lower-income, rural communities.<sup>126</sup>

Apart from disparities circumscribed by race and income, fracking raises other fundamental questions of human rights. A comprehensive analysis that charts the international legal development of water rights as they apply to oil and gas extraction concluded that the right to water for residents living near fracking sites is “likely to be severely curtailed.” Noting that access to clean and safe drinking water is codified by the United Nations General Assembly as a human right essential to the full development of life and all other human rights, the authors argue that, because the fracking industry does not face the true societal cost of water in their production decisions, ownership of this essential-to-life resource is effectively transferred from society to industry, with no protection for this essential human right. In the United States alone, “there is considerable evidence that the human right to water will be seriously undermined by the growth of the unconventional oil and gas industry, and given its spread around the globe this could soon become a global human rights issue.”<sup>127</sup>

Three international human rights bodies have called for prohibitions on fracking. In February 2019, the Committee on Elimination of Discrimination Against Women, which monitors the implementation of the 1979 United Nations treaty that serves as an international bill of rights for women, called on the United Kingdom to ban fracking on the ground that fracking damages communities and imperils the climate in ways that disproportionately harm women and girls living in rural areas.<sup>128, 129</sup> In October 2018, the United Nations Committee on Economic, Social and Cultural Rights warned Argentina that its plans for large-scale fracking in the Vaca Muerta Shale region would create adverse economic and cultural rights impacts on the indigenous Mapuche people.<sup>130</sup> In May 2018, the Permanent People’s Tribunal, a Rome-based forum focused on human rights violations, issued an advisory opinion based on a two-year investigation that collected testimonies and reports from scientists and fracking-impacted communities.

In the words of the court,

The evidence clearly demonstrates that the processes of fracking contribute substantially to anthropogenic harm, including climate change and global warming, and involve massive violations of a range of substantive and procedural human rights and the rights of

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<sup>126</sup> Silva, G. S., Warren, J. L., & Deziel, N. C. (2018) Spatial modeling to identify sociodemographic predictors of hydraulic fracturing wastewater injection wells in Ohio census block groups. *Environmental Health Perspectives*, 126(6), 067008. doi: 10.1289/EHP2663

<sup>127</sup> Palmer, R. C., Short, D., & Auch, W. E. T (2018). The human right to water and unconventional energy. *International Journal of Environmental Research and Public Health*, 15(9), 1858. doi: 10.3390/ijerph15091858

<sup>128</sup> United Nations Committee on the Elimination of Discrimination Against Women (2018, July 27). List of issues in relation to the eighth periodic report of the United Kingdom of Great Britain and Northern Ireland. [https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2fGBR%2fCO%2f8&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CEDAW%2fC%2fGBR%2fCO%2f8&Lang=en)

<sup>129</sup> Center for International Environmental Law (2018, March 13). UN body recommends UK consider complete fracking ban to protect human rights [Press statement]. Retrieved from <https://www.ciel.org/news/un-body-recommends-uk-consider-complete-fracking-ban-to-protect-human-rights/>

<sup>130</sup> Center for International Environmental Law (2018, October 19). CIEL statement on the Committee on Economic, Social, and Cultural Rights (CESCR)’s recommendations for the State of Argentina regarding its Vaca Muerta shale gas development [Press statement]. Retrieved from <https://www.ciel.org/news/ciel-statement-on-the-committee-on-economic-social-and-cultural-rights-cescrs-recommendations-for-the-state-of-argentina-regarding-its-vaca-muerta-shale-gas-development/>

nature. Thus the industry has failed to fulfill its legal and moral obligations.... The dangers of fracking to the rights of people, communities, and nature are inherent in the industry.... We will go beyond the call for a moratorium and recommend that fracking should be banned.<sup>131</sup>

**15) Health professionals are increasingly calling for bans or moratoria on fracking, based on a range of health hazards and as reviews of the data confirm evidence for harm.**

In May 2015, the Medical Society of the State of New York passed a resolution recognizing the potential health impacts of natural gas infrastructure and pledging support for a governmental assessment of the health and environmental risks associated with natural gas pipelines. (See footnote 856.) The American Medical Association (AMA) adopted a similar resolution that supports legislation requiring all levels of government to seek a comprehensive Health Impact Assessment regarding the health and environmental risks associated with natural gas pipelines. (See footnote 855.)

In May 2016, Physicians for Social Responsibility called for a ban on fracking. (See footnote 1079.)

In July 2016, the UK health professional organization Medact released an updated assessment of the potential health impacts of shale fracking in England, concluding that the United Kingdom should abandon its policy to encourage shale gas extraction and urged an “indefinite moratorium” on fracking. (See footnote 1077.)

In October 2016, a group of health care professionals in Massachusetts called for an immediate moratorium on major new natural gas infrastructure until the impact of these projects on the health of the communities affected could be adequately determined through a comprehensive Health Impact Assessment. (See footnote 1074.) The group noted that the operation of natural gas facilities increases the risk of human exposures to toxic, cancer-causing, and radioactive pollution due to the presence of naturally co-occurring contaminants, toxic additives to the hydraulic fracturing process, and through the operation of transmission pipelines.

Also in 2016, in a unanimous vote of the society’s 300-member House of Delegates, the Pennsylvania Medical Society called for a moratorium on new shale gas drilling and fracking in Pennsylvania and an initiation of a health registry in communities with pre-existing operations. (See footnotes 1071, 1072).

In 2017, health officials in Los Angeles called for a comprehensive health study in the aftermath of the massive methane leak in Aliso Canyon. (See footnote 1068.)

In March 2019, Doctors for the Environment Australia announced the reinforcement of its position that no new gas extraction of any kind should occur in Australia.

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<sup>131</sup> Permanent People’s Tribunal. (2018, May 14-18). Session on human rights, fracking and climate change—advisory opinion. Retrieved from <http://permanentpeopletribunal.org/wp-content/uploads/2019/04/AO-final-12-APRIL-2019.pdf>

Concerned Health Professionals of New York, which provided scientific and medical guidance for the successful effort to ban fracking in New York State, has inspired affiliations of like-minded public health scientists and health care providers that have been advocating for moratoria or bans on fracking in various other regions. These include Concerned Health Professionals of Maryland, Concerned Health Professionals of Ireland, Concerned Health Professionals of Neuquén, Argentina, and Concerned Health Professionals UK.

## Conclusion

All together, findings to date from scientific, medical, and journalistic investigations combine to demonstrate that fracking poses significant threats to air, water, human health, public safety, community cohesion, long-term economic vitality, biodiversity, seismic stability, and climate stability.

**The rapidly expanding body of scientific evidence compiled and referenced in the present volume is massive, troubling, and cries out for decisive action. Across a wide range of parameters, from air and water pollution to radioactivity to social disruption to greenhouse gas emissions, the data continue to reveal a plethora of recurring problems and harms that cannot be sufficiently averted through regulatory frameworks. There is no evidence that fracking can operate without threatening public health directly and without imperiling climate stability upon which public health depends. The only method of mitigating its grave harm to public health and the climate is a complete and comprehensive ban on fracking.**

In the words of investigative journalist Andrew Nikiforuk:

Industry swore that its cracking rock technology was safe and proven, but science now tells a different story. Brute force combined with ignorance ... has authored thousands of earthquakes ... [and] called forth clouds of migrating methane.... The science is complicated but clear: cracking rock with fluids is a chaotic activity and no computer model can predict where those fractures will go. The regulatory record shows that they often go out of zone; extend into water; and rattle existing oil and gas wells, and these rattled wells are leaking more methane.<sup>132</sup>

In closing, we cite comments by epidemiologist Irena Gorski, co-author of the 2019 review of fracking's health concerns published in the Oxford Research Encyclopedia of Global Public Health. Her words speak for all who have contributed to this Compendium:

What we found pushes back against the narrative we often hear that say we don't know enough about the health impacts yet. We have enough evidence at this point that these health impacts should be of serious concern to policymakers interested in protecting public health....As a fossil fuel, natural gas extraction and use is contributing to climate change, of course. But before conducting this study, I didn't realize the amount of evidence we have that it may be even worse than coal. We included this in our study because climate change has its own contributions to health impacts. These indirect impacts will take longer to appear than the direct health impacts, but they have the potential to be significant.<sup>133</sup>

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<sup>132</sup> Nikiforuk, A. (2016, October 16). Acceptance speech, USA National Science in Society Journalism Awards reception, San Antonio, Texas. Retrieved from <http://www.ernstversusencana.ca/andrew-nikiforuk-wins-usa-national-science-in-society-award-slick-water-nasws-awards-honor-outstanding-investigative-interpretive-reporting-sciences-their-impact-for-good-and-ill/>

<sup>133</sup> Marusic, K. (2019, April 15). After a decade of research, here's what scientists know about the health impacts of fracking. *Environmental Health News*. Retrieved from <https://www.ehn.org/health-impacts-of-fracking-2634432607.html>

## Compilation of Studies & Findings

### Air pollution

*Air pollution associated with fracking is a grave concern with a range of impacts. Researchers have documented more than 200 different air pollutants near drilling and fracking operations. Of these, 61 are classified as hazardous air pollutants with known health risks, and 26 are classified as endocrine disruptors. Areas with substantial drilling and fracking build-out show high levels of ground-level ozone (smog), striking declines in air quality, and, in several cases, increased rates of health problems with known links to air pollution. Air sampling surveys find high concentrations of volatile organic compounds (VOCs), especially carcinogenic benzene and formaldehyde, both at the wellhead and at distances that exceed legal setback distances from wellhead to residence. In some cases, VOC concentrations exceeded federal safety standards by several orders of magnitude. In 2018, researchers in Colorado documented that air pollution increased with proximity to drilling and fracking operations and was sufficiently high to raise cancer risks in some cases. Exposure to emissions from natural gas flares and diesel exhaust from the 4,000-6,000 truck trips per well pad also pose respiratory health risks for those living near drilling operations. The United States leads the world in the number of flare stacks. Air pollutants from flaring operations include VOCs, polycyclic aromatic hydrocarbons, carbon monoxide, toxic heavy metals, formaldehyde, and soot.*

*Evidence implicates the U.S. shale gas boom in the recent global spike in atmospheric ethane and propane. Drilling and fracking operations in North Dakota's Bakken oil and gas field alone contribute two percent of global ethane emissions and directly impact air quality across North America. Like methane, ethane is both a greenhouse gas and a precursor for ozone formation. The accelerating pace of drilling and fracking activities and the current policy plan to reverse course on proposed regulations to reduce methane emissions are likely to exacerbate the air pollution problems that fracking creates, along with attendant health risks.*

- April 1, 2019 – A University of California, Berkeley team undertook a comprehensive review of current peer-reviewed literature on hazardous air pollutants found near oil and gas extraction operations. Hazardous air pollutants are those known or suspected to cause cancer, reproductive harm, birth defects, or other serious health effects. Reviewing 37 studies, the team identified a total of 61 different hazardous air pollutants that have been detected and measured near oil and gas drilling and fracking operations. The sources of these dangerous pollutants include a wide range of equipment, activities, and facilities—from dehydrators and condensate tanks to well drilling, flowback treatment, and oil storage facilities. The team found that the production phase of oil and gas extraction has the potential to emit the highest concentrations and the most complex mixtures of hazardous air pollutants over the longest time. (During the production phase, raw oil or natural gas is flowing from the well and is processed within various ancillary equipment, all of which can emit hazardous pollutants, such as benzene.) The highest and most sustained concentrations of hazardous air pollutants were found in “regions rich in oil,

wet gas, and condensate.” Their results further suggest that “exposure risks can be much higher if production equipment is collocated with condensate storage and wastewater impoundments.” The research team also uncovered an important disconnect between air pollution monitoring studies and those reporting on health impacts. In general, the levels of air pollution detected in the monitoring studies fell short of those known to cause health impacts and yet multiple health-based studies continue to find evidence of a spatial relationship between concentrations of hazardous air pollutants and incidence of health problems among people living near oil and gas operations. These findings suggest that existing air sampling methodologies may be under-reporting emissions or that prevailing health benchmarks are inadequate to identify health problems, especially when exposures include multiple chemicals.<sup>134</sup>

- March 14, 2019 – Approximately 1.7 million people live within one mile of an active oil or gas well in the Los Angeles metropolitan area. A University of California pilot study investigated air pollution around active wells in this densely populated urban area and showed that, even in neighborhoods where residents are exposed to complex mixtures of air pollution from multiple sources, levels of several volatile organic pollutants are higher in communities closer to wellheads and decrease in concentration with distance away from the wellheads. These include the carcinogen benzene and n-hexane. “We were able to identify gradient behavior along the transect downwind of the target oil/natural gas facility that was likely due, in part, to emissions from the facility.”<sup>135</sup>
- February 15, 2019 – In the first modeling study of drilling and fracking-related air pollution to include criteria air pollutants, a University of Texas, Arlington team found that concentrations of pollutants in the Barnett Shale region in north Texas were varied by terrain, with strongly sloping terrain giving the highest maximum concentrations for criteria air pollutants compared to level and moderate terrain. (Regulated by the U.S. Environmental Protection Agency [EPA] via applicable standards, the criteria air pollutants are ozone, particulate matter, lead, carbon monoxide, sulfur oxides, and nitrogen oxides.) The highest benzene and methane concentrations occurred in flat terrain and exceeded health-based standards.<sup>136</sup>
- January 18, 2019 – Flaring is a widely used practice for disposal of waste natural gas during oil drilling, in places that lack infrastructure for its capture and transport. Enabled by fracking, domestic oil production is at an all-time high, and this upswing has outpaced the build-out of pipelines to contain the natural gas that accompanies the oil as it flows to the surface. Using satellite technology, researchers identified 43,887 distinct oil and gas

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<sup>134</sup> Garcia-Gonzales, D. A., Shonkoff, S. B. C., Hays, J., & Jerrett, M. (2019). Hazardous air pollutants associated with upstream oil and natural gas development: A critical synthesis of current peer-reviewed literature. *Annual Review of Public Health*, 40, 283-304. doi: 10.1146/annurev-publhealth-040218-043715

<sup>135</sup> Garcia-Gonzales, D. A., Shamasunder, B., & Jerrett, M. (2019). Distance decay gradients in hazardous air pollution concentrations around oil and natural gas facilities in the city of Los Angeles: A pilot study. *Environmental Research*, 173, 232-236. doi: 10.1016/j.envres.2019.03.027

<sup>136</sup> Khalaj, F., & Sattler, M. (2019). Modeling of VOCs and criteria pollutants from multiple natural gas well pads in close proximity, for different terrain conditions: A Barnett Shale case study. *Atmospheric Pollution Research*. Advance online publication. Retrieved from <https://doi.org/10.1016/j.apr.2019.02.007>

flares in the Eagle Ford Shale region of south Texas from 2012 to 2016, with a peak in activity in 2014 and an estimated 4.5 billion cubic meters of total gas volume flared over the study period. Comparing these results with well permit data showed the majority of flares (82 percent) were linked to oil wells, with more than 90 percent associated with horizontally drilled wells. These flares were not equally distributed across the region. Just five of 49 counties in the Eagle Ford Shale area accounted for 71 percent of flaring. “Our results suggest flaring may be a significant environmental exposure in parts of this region.” Air pollutants from flaring operations include VOCs, polycyclic aromatic hydrocarbons, carbon monoxide, toxic heavy metals, formaldehyde, and soot.<sup>137</sup>

- July 27, 2018 – A report written by the United Kingdom’s Air Quality Expert Group found that shale gas operations would increase air pollution (nitrogen dioxides and VOCs) both nationally and locally within the United Kingdom. However, the report languished for three years and was finally released four days after shale gas extraction was officially approved for the Lancashire region of northwest England.<sup>138, 139</sup>
- July 16, 2018 – A team from the Colorado Department of Public Health and Environment used existing air monitoring data sets from disparate locations to determine if air pollution levels near drilling and fracking operations are sufficient to create health problems in Colorado residents who live more than 500 feet away from a well head. Overall, they found individual VOC levels below those that are known to pose cancer and non-cancer health risks. However, the authors could not evaluate the risk of possible intermittent spikes in emissions during different phases of operation and evaluated only a subset of all VOCs emitted from drilling and fracking operations at these different phases. “Future studies are greatly needed that focus on quantifying these acute, peak exposures to people living near oil and gas operations, with particular emphasis on characterization of the volatile organic compounds identified as posing the greatest potential public health concerns, such as benzene.”<sup>140</sup>
- July 13, 2018 – Drilling and fracking operations emit pollutants that form ozone and fine particles. Because air pollution from oil and gas operations originate from a large number of small, diffuse sources, estimating the level and location of emissions is difficult. An EPA team used a national emissions inventory for the year 2011 to characterize oil and gas emissions over space and time and to estimate the future human health burden

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<sup>137</sup> Franklin, M., Chau, K., Cushing, L. J., & Johnston, J. E. (2019). Characterizing flaring from unconventional oil and gas operations in south Texas using satellite observations. *Environmental Science & Technology*, 53(4), 2220-2228. doi: 10.1021/acs.est.8b05355

<sup>138</sup> UK Air Quality Expert Group. (2018, July 27). *Potential Air Quality Impacts of Shale Gas Extraction in the UK*. Retrieved from [https://cedrec.com/cedrec\\_images/1807251315\\_AQEG\\_Shale\\_Gas\\_Extraction\\_Advice\\_Note\\_vfinal\\_for\\_publishing.pdf](https://cedrec.com/cedrec_images/1807251315_AQEG_Shale_Gas_Extraction_Advice_Note_vfinal_for_publishing.pdf)

<sup>139</sup> Carrington, D. (2018, August 2). Buried UK government report finds fracking increases air pollution. *The Guardian*. Retrieved from <https://www.theguardian.com/environment/2018/aug/02/buried-uk-government-report-finds-fracking-increases-air-pollution>

<sup>140</sup> McMullin, T. S., Bamber, A. M., Bon, D., Vigil, D. I., & Van Dyke, M. (2018). Exposure and health risks from volatile organic compounds in communities located near oil and gas exploration and production activities in Colorado. *International Journal of Environmental Research and Public Health*, 15(7). doi: 10.3390/ijerph15071500

attributable to the oil and gas sector. For the year 2025, the authors projected that oil and gas extraction activities will cause 1000 deaths across the United States from exposure to fine particles and 970 deaths from ozone exposure, with the highest impacts in Colorado, Pennsylvania, Texas, and West Virginia.<sup>141</sup>

- June 13, 2018 – A British team used a new air quality forecasting model to simulate the health impacts of potential emissions from fracking operations in the United Kingdom, should large-scale fracking go forward. The results showed large projected increases in nitrogen oxides and volatile organic compounds across the UK airshed. These increases would contribute to approximately 110 extra premature deaths (with a range of 50-530 deaths) each year across the U.K.<sup>142</sup>
- May 29, 2018 – An Oregon State University team measured polycyclic aromatic hydrocarbon air pollutants near drilling and fracking operations in rural eastern Ohio. A known component of fracking-related air pollution, polycyclic aromatic hydrocarbons are linked to cancer risk, respiratory distress, and poor birth outcomes. Using both air samplers and wristbands to assess personal exposures of residents living near active or proposed well sites, the researchers found elevated air pollution levels near active well sites. Further, the wristbands from participants who lived in homes with well pads on their property registered higher levels of air pollutants than participants without wells. “These findings suggest that living or working near an active natural gas extraction well may increase personal polycyclic aromatic hydrocarbon exposure.”<sup>143</sup>
- May 18, 2018 – A Canadian and U.S. research team monitored methane levels in urban Morgantown, West Virginia during various stages of hydraulic fracturing at a single well pad. They found that emissions at the site were greatest during the flow-back stage, a result that supports previous studies.<sup>144</sup>
- March 27, 2018 – A team led by University of Colorado School of Public Health scientists found that air pollution levels along Colorado’s heavily drilled Front Range increased with proximity to drilling and fracking operations and were sufficiently high to raise cancer risks. For people living within 500 feet of a well, lifetime cancer risks were eight times higher than the EPA’s upper threshold. Elevated levels of benzene and alkanes were of particular concern. “These findings indicate that state and federal

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<sup>141</sup> Fann, N., Baker, K. R., Chan, E. A. W., Eyth, A., Macpherson, A., Miller, E., & Snyder, J. (2018). Assessing human health PM<sub>2.5</sub> and ozone impacts from U.S. oil and natural gas sector emissions in 2025. *Environmental Science & Technology*, 52, 8095-8103. doi: 10.1021/acs.est.8b02050

<sup>142</sup> Archibald, A. T., Ordóñez, C., Brent, E., & Williams, M. L. (2018). Potential impacts of emissions associated with unconventional hydrocarbon extraction on UK air quality and human health. *Air Quality, Atmosphere & Health*, 11(6), 627-637. doi: 10.1007/s11869-018-0570-8

<sup>143</sup> Paulick, L. B., Hobbie, K. A., Rohlman, D., Smith, B. W., Scott, R. P., Kincl, L., . . . Anderson, K. A. (2018). Environmental and individual PAH exposures near rural natural gas extraction. *Environmental Pollution*, 241, 397-405. doi: 10.1016/j.envpol.2018.05.010

<sup>144</sup> Williams, P. J., Reeder, M., Pekney, N. J., Risk, D., Osborne, J., & McCawley M. (2018). Atmospheric impacts of a natural gas development within the urban context of Morgantown, West Virginia. *Science of the Total Environment*, 639, 406-416. doi: 10.1016/j.scitotenv.2018.04.422



regulatory policies may not be protective of health for populations residing near oil and gas facilities.”<sup>145</sup>

- March 21, 2018 – Evaluating 48 peer-reviewed studies that sampled air near drilling and fracking operations, researchers identified more than 200 different airborne chemicals associated with oil and gas extraction. Ethane, benzene, and n-pentane were the three most frequently detected. Twenty-six of these 200 chemicals are classified as endocrine disruptors—chemicals that can interfere with hormone systems and may affect reproduction, development, and neurological functioning.<sup>146</sup>
- March 18, 2018 – There are now more than 22,000 active fracking wells in the rural Eagle Ford Shale region of Texas, which has undergone a 10-fold increase in oil and gas extraction since 2010. A research team from San Francisco State University and University of Southern California used remote sensing data that incorporated infrared observations of combustion sources to estimate exposure of local residents to hazardous air pollutants from associated flaring operations. Their method confirmed extensive flaring in close proximity to homes.<sup>147</sup>
- February 26, 2018 – The presence of ethane and propane in the atmosphere is an indication of leaks during fossil fuel extraction and distribution, including fracking and its attendant activities, especially venting and flaring. (Fossil fuel combustion is not a source of ethane or propane.) According to a study led by a University of York team that used data collected from 20 observatories around the world, global atmospheric levels of ethane and propane have been underestimated by more than 50 percent. These results mean that hydrocarbon emissions from fossil fuel extraction activities in general—including methane—may be two to three times higher than previously presumed. Both ethane and methane are ozone precursors and contribute to the creation of smog. The authors noted that enhanced ethane and propane emission results mean higher levels of health-damaging ozone in both rural and urban areas.<sup>148</sup> In related press materials about this research, Ally Lewis, a co-author of the study, said, “Levels of ethane and propane declined in many places in the 1980s and 1990s, but global growth in the demand for natural gas means these trends may be reversing. The effects of higher ozone would be felt in the rural environment where it damages crops and plants, and in cities on human health.” Co-author Lucy Carpenter, said, “We know that a major source of ethane and propane in the atmosphere is from ‘fugitive’ or unintentional escaping emissions during

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<sup>145</sup> McKenzie, L. M., Blair, B., Hughes, J., Allshouse, W. B., Blake, N. J., Helmig, D., . . . Adgate, J.L., (2018). Ambient nonmethane hydrocarbon levels along Colorado’s northern Front Range: Acute and chronic health risks. *Environmental Science & Technology*, 52(8), 4514-4525. doi: 10.1021/acs.est.7b05983

<sup>146</sup> Bolden, A. L., Schultz, K., Pelch, K. E., & Kwiatkowski, C. F. (2018). Exploring the endocrine activity of air pollutants associated with unconventional oil and gas extraction. *Environmental Health*, 17(26). doi: 10.1186/s12940-018-0368-z

<sup>147</sup> Cushing L., Johnston J., Franklin M., & Chau, K. (2018). Using satellite observations to estimate exposure to flaring: implications for future studies of the health impacts of unconventional oil and gas operations. *Occupational and Environmental Medicine*, 75 (Suppl 1), A5-A6. doi: 10.1136/oemed-2018-ISEEabstracts.13

<sup>148</sup> Dalsøren, S. B., Myhre, G., Hodnebrog, Ø., Myhre, C. L., Stohl, A., Pissò, I., . . . Wallasch, M. (2018). Discrepancy between simulated and observed ethane and propane levels explained by underestimated fossil emissions. *Nature Geoscience*, 11, 178-184. doi: 10.1038.s41561-018-0073-0

fossil fuel extraction and distribution. If ethane and propane are being released at greater rates than we thought, then we also need to carefully re-evaluate how much of the recent growth of methane in the atmosphere may also have come from oil and natural gas development.”<sup>149</sup>

- February 5, 2018 – The Tropospheric Ozone Assessment Report analyzes data from all available ozone monitors around the world. Its 2018 report found that, in the United States, levels of ground-level ozone (smog) dropped steadily between 2000 and 2014 except in rural areas of the Rocky Mountain west where levels remained steady or rose. Oil and gas drilling is likely responsible. Rural areas in the western United States have fewer emission sources and yet they have been experiencing high ozone levels, especially in the winter.<sup>150</sup>
- November 2, 2017 – In a review paper that explores how the U.S. fracking boom has contributed to air pollution in impacted communities, Texas A&M atmospheric scientist Gunnar W. Schade identified ozone and benzene as two important chemicals of concern. Documenting trends is challenging because fracking-related air pollutants typically originate in rural places without routine air pollution monitoring. A new air monitor in the Eagle Ford Shale region allowed researchers to use fingerprinting analysis to show that 60 percent of ambient benzene in the air now comes from drilling and fracking operations, including gas flares. Before the shale boom, the majority of benzene in the region came from tailpipe emissions. “In some areas, decades-long progress on ozone air quality has stalled; in others, particularly the Uintah basin in Utah, a new ozone problem has emerged due to the fracking industry’s emissions.” Downwind of the Eagle Ford Shale, San Antonio’s ozone levels are now trending close to 75 ppb, which exceeds the new recommended limit of 70 ppb. “The shale boom has create a new source of large-scale, diffuse hydrocarbon emissions that adversely affect air toxics levels. . . . The continued growth of the fracking industry as well as plans to remove regulations on methane emissions will not alleviate high hydrocarbon emissions and associated regional ozone problems.”<sup>151</sup>
- April 12, 2017 – Using aircraft, a University of Michigan-led team collected plume samples from 37 flare stacks in the Bakken Shale region of North Dakota to calculate emissions of black carbon (soot), methane, and ethane from natural gas flares. They

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<sup>149</sup> University of York. (2018, February 26). Global fossil fuel emissions of hydrocarbons underestimated [press release]. Retrieved from <https://www.york.ac.uk/news-and-events/news/2018/research/global-fossil-fuel-emissions-underestimated/>

<sup>150</sup> Fleming, Z. L., Doherty, R. M., von Schneidmesser, E., Malley, C. S., Cooper, O. R., Pinto, J. P., . . . Feng, Z., (2018). Tropospheric Ozone Assessment Report: present-day ozone distribution and trends relevant to human health. *Elementa: Science of the Anthropocene*, 6(1), 12. doi: 10-1525/elementa.273

<sup>151</sup> Schade, G. W. (2017, November 2). How has the US fracking boom affected air pollution in shale areas? *The Conversation*. Retrieved from <https://theconversation.com/how-has-the-us-fracking-boom-affected-air-pollution-in-shale-areas-66190>

determined that flares contribute almost 20 percent of the total emissions of methane and ethane from the Bakken region, as measured by field studies.<sup>152</sup>

- December 29, 2016 – Exposure to air pollutants from well pads decreases quickly with distance. However, according to recent studies, people living kilometers away from actual drilling and fracking operations also show elevated risk of disease known to be linked to air pollution. This review paper investigated the possible role that exposure to diesel exhaust from fracking-related road traffic is playing in creating public health impacts in surrounding communities. “Road traffic generated by hydraulic fracturing operations is one possible source of environmental impact whose significance has, until now, been largely neglected . . . with 4,000-6,000 vehicles visiting the well pad during the operations.” As a starting point for exposure assessment, the author recommended GIS modeling studies with a focus on traffic patterns and exacerbation of pediatric asthma.<sup>153, 154</sup>
- October 16, 2016 – A review of recent studies documenting harm to both public health and agricultural yields from rising ozone levels identified oil and gas fields as “a major and growing source of ozone in the United States.”<sup>155</sup>
- October 16, 2016 – In response to a lawsuit, the EPA acknowledged that its 33-year-old formula for estimating emissions from flaring operations requires revision as it may dramatically underestimate levels of health-damaging air pollutants. Emissions from flare stacks typically include carbon monoxide, nitrogen oxides, benzene, formaldehyde, and xylene, but levels of these smog-forming compounds are seldom measured directly.<sup>156, 157</sup>
- October 5, 2016 – A review of recent studies documented connections between oil and gas development and worsening ozone levels in western states. Drilling and fracking operations have pushed Pinedale, Wyoming out of compliance with federal ozone standards. Colorado has exceeded federal ozone limits for the past decade, a period that corresponds to a statewide boom in oil and gas drilling.<sup>158</sup>

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<sup>152</sup> Gvakharia, A., Kort, E. A., Brandt, A., Peischl, J., Ryerson, T. B., Schwarz, J. P., . . . Sweeney, C. (2017). Methane, black carbon, and ethane emissions from natural gas flares in the Bakken Shale, North Dakota.

*Environmental Science & Technology*, 51(9), 5317-5325. doi: 10.1021/acs.est.6b05183

<sup>153</sup> McCawley, M. A. (2017). Does increased traffic flow around unconventional resource development activities represent the major respiratory hazard to neighboring communities?: Knowns and unknowns. *Current Opinion in Pulmonary Medicine*, 23(2), 161-166. doi: 10.1097/MCP.0000000000000361

<sup>154</sup> Frazier, R. (2017, June 16). On health effects, blame the trucks, not the fracking? *Allegheny Front*. Retrieved from <https://www.alleghenyfront.org/on-health-effects-blame-the-trucks-not-the-fracking/>

<sup>155</sup> Robbins, J. (2016, October 16). In new ozone alert, a warning of harm to plants and to people. *Yale Environment 360*. Retrieved from [http://e360.yale.edu/feature/ground\\_level\\_ozone\\_harming\\_plants\\_humans/3044/](http://e360.yale.edu/feature/ground_level_ozone_harming_plants_humans/3044/)

<sup>156</sup> United States District Court for the District of Columbia. (2016, October 16). Air Alliance Houston, et al. v. Gina McCarthy, Administrator, United States Environmental Protection Agency. Consent decree. Case 1:16-cv01998. Retrieved from <https://www.documentcloud.org/documents/3127584-Consent-Decree-on-Flares.html>

<sup>157</sup> Hasemyer, D. (2016, October 13). EPA agrees that its emissions estimates from flaring may be flawed. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/12102016/epa-natural-gas-oil-drilling-flaring-emissions-estimates-flawed-fracking>

<sup>158</sup> Boiko-Weyrauch, A. (2016, October 5). Ozone, asthma and the oil and gas connection. *Inside Energy*. Retrieved from <http://insideenergy.org/2016/10/05/ozone-asthma-and-the-oil-and-gas-connection/>

- September 1, 2016 – A NASA-led research team collected whole air samples throughout the Barnett Shale basin in Texas. Chemical analysis showed that they contained benzene, hexane, and toluene at levels 2-50 times greater than the local background and similar to those seen in other intensely drilled shale basins in Colorado and Utah. There is “some evidence to suggest that public concerns for potential chronic health risks are not unwarranted.”<sup>159</sup>
- July 23, 2016 – A study conducted at the Boulder Atmospheric Observatory examined sources of summertime ozone formation (smog) in Colorado’s Front Range and found that 17 percent of locally created ozone was created by VOCs from drilling and fracking operations.<sup>160</sup> Colorado has exceeded the federal ozone standard for the past nine years, a period of time that corresponds to a boom in oil and gas drilling in the Wattenberg Gas Field where the number of active wells has nearly doubled.<sup>161</sup>
- June 13, 2016 – Between 2009 and 2014, ethane emissions in the Northern Hemisphere increased by about 400,000 tons annually, the bulk of it from North American oil and gas activity, according to research by an international team led by the University of Colorado Boulder.<sup>162</sup> After peaking in the 1970s, global ethane emissions began declining, primarily due to stricter air quality emission controls. In 2009, however, that downward trend reversed itself. “About 60 percent of the drop we saw in ethane levels over the past 40 years has already been made up in the past five years.... If this rate continues, we are on track to return to the maximum ethane levels we saw in the 1970s in only about three more years. We rarely see changes in atmospheric gases that quickly or dramatically,” said lead researcher Detlev Helmig.<sup>163</sup> Samples were collected from locations around the world, but the largest increases in ethane were documented over areas of heavy oil and gas activity in the central and eastern United States. Ethane contributes to the creation of ground-level ozone pollution (smog), a known human health hazard. The authors noted that “... ozone production from these emissions has led to air quality standard exceedances in the Uintah Basin, Utah, and Upper Green River Basin, Wyoming, [oil and natural gas] regions.” Two scientists not involved in the study published an accompanying commentary, concluding, “There is a danger that these non-methane hydrocarbon emission changes can offset emission policies and controls aimed at

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<sup>159</sup> Marrero, J. E., Townsend-Small, A., Lyon, D. R., Tsai, T. R., Meinardi, S., & Blake, D. R. (2016). Estimating emissions of toxic hydrocarbons from natural gas production sites in the Barnett Shale Region of Northern Texas. *Environmental Science & Technology*, 50(19), 10756-10764. doi: 10.1021/acs.est.6b02827

<sup>160</sup> McDuffie, E.E., Edwards, P.M., Gilman, J.B., Lerner, B.M., Dubé, W.P., Trainer, M., . . . Brown, S.S. (2016). Influence of oil and gas emissions on summertime ozone in the Colorado Northern Front Range. *Journal of Geophysical Research: Atmospheres*. doi: 10.1002/2016JD025265

<sup>161</sup> University of Colorado at Boulder. (2016, August 8). Accounting for ozone: Study first to quantify impact of oil and gas emissions on Denver's ozone problem. *ScienceDaily*. Retrieved from <https://www.sciencedaily.com/releases/2016/08/160808123832.htm>

<sup>162</sup> Helmig, D., Rossabi, S., Hueber, J. Tans, P., Montzka, S. A., Masarie, K., . . . Pozzer, A. (2016). Reversal of global atmospheric ethane and propane trends largely due to US oil and natural gas production. *Nature Geoscience*, 9, 490–495. doi: 10.1038/ngeo2721

<sup>163</sup> Helmig, D. & Scott, J. (2016, June 13). Global ethane concentrations rising again, says study. *News Center University of Colorado Boulder*. Retrieved from <http://www.colorado.edu/news/releases/2016/06/13/global-ethane-concentrations-rising-again-says-study>

reducing ozone concentrations,” and “[t]hese oil and gas operations are threatening to reverse what had been an important success story: decades of declining air pollution in North America.”<sup>164</sup> (See also the entry dated April 2, 2016 in Threats to the Climate System.)

- June 1, 2016 – Existing data on air pollutants emitted from drilling and fracking operations “support precautionary measures to protect the health of infants and children,” according to a review by a team of researchers (members of which include co-authors of this Compendium). Researchers focused on exposures to ozone, particulate matter, silica dust, benzene, and formaldehyde—all of which are associated with drilling and fracking operations—noting that all are linked to adverse respiratory health effects, particularly in infants and children. Benzene, for example, emitted from gas wells, production tanks, compressors, and pipelines, is a carcinogen also linked to serious respiratory outcomes in infants and children, including pulmonary infections in newborns. As the authors emphasized, this review did not consider other air pollutants commonly associated with drilling and fracking activities, namely hydrogen sulfide, polycyclic aromatic hydrocarbons, and oxides of nitrogen. Although improved exposure assessment, air monitoring, and long-term studies are still lacking, existing evidence was sufficient for the authors to “strongly recommend precautionary measures at this time.”<sup>165</sup>
- April 26, 2016 – About two percent of global ethane emissions originate from the Bakken shale oil and gas field, which, according to research led by University of Michigan researchers, emits 250,000 tons of ethane per year.<sup>166</sup> “Two percent might not sound like a lot, but the emissions we observed in this single region are 10 to 100 times larger than reported in inventories. They directly impact air quality across North America. And they’re sufficient to explain much of the global shift in ethane concentrations,” according to Eric Kort, first author of the study.<sup>167</sup> Ethane is a gas that affects climate and decreases air quality. As a greenhouse gas, ethane is the third-largest contributor to human-caused climate change. Ethane contributes to ground-based ozone pollution as it breaks down and reacts with sunlight to create smog. This surface-level ozone is linked to respiratory problems, eye irritation, and crop damage. Global ethane levels were decreasing until 2009, leading the researchers to suspect that the U.S. shale gas boom may be responsible for the global increase in levels since 2010.
- April 5, 2016 – Helicopter-based infrared camera surveys of more than 8,000 oil and gas wells in seven U.S. regions found that well pads emit considerably more methane and VOCs than captured by earlier inventories. Moreover, these emissions were widely and

<sup>164</sup> Hakola, H. & Hellén, H. (2016). The return of ethane. *Nature Geoscience*, 9, 475-476. doi: 10.1038/ngeo2736

<sup>165</sup> Webb, E., Hays, J., Dyrszka, L., Rodriguez, B., Cox, C., Huffling, K., & Bushkin-Bedient, S. (2016). Potential hazards of air pollutant emissions from unconventional oil and natural gas operations on the respiratory health of children and infants. *Reviews on Environmental Health*, 31(2), 225-243. doi: 10.1515/reveh-2014-0070

<sup>166</sup> Kort, E. A., Smith, M. L., Murray, L. T., Gvakharia, A. Brandt, A. R., Peischl, J., . . . Travis, K. (2016). Fugitive emissions from the Bakken shale illustrate role of shale production in global ethane shift. *Geophysical Research Letters*, 43, 4617–4623. doi: 10.1002/2016GL068703

<sup>167</sup> Moore, C. S., & Human K. (2016, April 26). One oil field a key culprit in global ethane gas increase. *Michigan News*. Retrieved from <http://ns.umich.edu/new/multimedia/videos/23735-one-oil-field-a-key-culprit-in-global-ethane-gas-increase>

unpredictably variable from site to site and from well to well. Over 90 percent of total airborne emissions from well pads originated with vents and hatches on aboveground storage tanks.<sup>168</sup> The inability to predict which well sites were “superemitters” (meaning that they leaked into the air more than 200 cubic feet of methane and VOCs per hour) implies that continuous, site-specific monitoring is required to regulate methane leaks from drilling and fracking operations. In a comment about the findings to *InsideClimate News*, Cornell University engineer Anthony Ingraffea, who was not an author of the paper, said, “It makes regulation very difficult. If you have all these possible sites where you can have leaks, you can never have enough inspectors with all the right equipment being in all the right places at all the right times. It’s too complex a system.”<sup>169</sup>

- February 19, 2016 – Legally enforced minimal distances between well sites and residences are based on political compromises rather than peer-reviewed science and “may not be sufficient to reduce potential threats to human health in areas where hydraulic fracturing occurs,” according to the findings of an interdisciplinary team including medical professionals and other researchers. The team incorporated geography, current regulations, historical records of blowout incidents and evacuations, thermal modeling, direct air pollution measurement, and vapor cloud modeling within the Marcellus (PA), Barnett (TX), and Niobrara (Northeastern and Northwestern Colorado and parts of Wyoming, Kansas, and Nebraska) Shale regions. The authors focused solely on well sites and excluded pipelines and compressor stations, which limited the data on explosions and evacuations and restricted air pollution results. Even so, the results showed that current natural gas well setbacks in the three areas “cannot be considered sufficient in all cases to protect public health and safety.” People living within setback distances are potentially vulnerable to thermal injury during a well blowout, and they are also susceptible to exposures of benzene and hydrogen sulfide at levels above those known to cause health risks.<sup>170</sup>
- August 1, 2015 – “[C]linicians should be aware of the potential impact of fracking when evaluating their patients,” concluded a team writing on behalf of the Occupational and Environmental Health Network of the American College of Chest Physicians. Their article stated that the over 200,000 U.S. workers employed by well-servicing companies “... are exposed to silica, diesel exhaust, and VOCs, and, at some sites, hydrogen sulfide and radon, raising concerns about occupational lung diseases, including silicosis, asthma, and lung cancer.” The authors went on to say, “[i]n addition to occupational exposures, workers and nearby residents are also exposed to air pollutants emitted from various stages of fracking, including nitrogen oxides (NOx), VOCs, ozone, hazardous air pollutants, methane, and fine particulate matter.” Authors pointed to several recent

<sup>168</sup> Lyon, D. R., Alvarez, R. G., Zavala-Araiza, D., Brandt, A. R., Jackson, R. B., & Hamburg, S. P. (2016). Aerial surveys of elevated hydrocarbon emissions from oil and gas production sites. *Environmental Science & Technology*, 50(9). doi: 10.1021/acs.est.6b00705

<sup>169</sup> McKenna, P. (2016, April 8). Researchers find no shortcuts for spotting wells that leak the most methane. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/07042016/big-methane-leaks-superemitters-oil-gas-production-climate-change-edf>

<sup>170</sup> Haley, M., McCawley, M., Epstein, A. C., Arrington, B., & Bjerke, E. F. (2016). Adequacy of current state setbacks for directional high-volume hydraulic fracturing in the Marcellus, Barnett, and Niobrara Shale plays. *Environmental Health Perspectives*. Advance online publication. doi: 10.1289/ehp.1510547

reversals in progress on air quality owed to fracking-related activity, including significant emissions of nitrogen oxides, a precursor of ozone, and spikes in fine particulate matter in fracking-intensive areas of Pennsylvania.<sup>171</sup>

- July 9, 2015 – The California Council on Science and Technology, in collaboration with the Lawrence Berkeley National Laboratory, released the second and third volumes of an extensive, peer-reviewed assessment of fracking in California. Air quality impacts are the focus of volume 2, chapter 3. The assessment found that current inventory methods underestimate methane and volatile organic chemical emissions from oil and gas operations and that fracking occurs in areas of California—most notably in the San Joaquin Valley and South Coast Air Basins—that already suffer from serious air quality problems. Further, no experimental studies of air emissions from drilling and fracking operations have ever been conducted in California. Although California has well-developed air quality inventory methods, they are “not designed to estimate well stimulation emissions directly, and it is not possible to determine well stimulation emissions from current inventory methods.”<sup>172</sup>
- July 1, 2015 – In accordance with California Senate Bill No. 4, the California Division of Oil, Gas, and Geothermal Resources released a three-volume environmental impact report on oil and gas well stimulation treatments in the state (which, in California, include fracking along with acidizing and other unconventional extraction technologies that break up oil- or gas-containing rock). The Division determined that fracking and related operations can have “significant and unavoidable” impacts on air quality, including increasing ozone and other federally regulated pollutants to levels that violate air quality standards or that would make those violations worse.<sup>173, 174</sup>
- May 29, 2015 – Each of stage of the drilling and fracking process “... has distinct operations that occur and particular sets of air emissions that may affect the respiratory tract,” wrote West Virginia University researcher Michael McCawley. Some states do have setback requirements, which “... may provide a margin of safety for fire and explosions but [do] not necessarily assure complete dilution or negligible exposure from air emissions.” His paper described the specific air contaminants associated with respiratory effects for each stage of operations. For example, the actual fracking stage potentially emits diesel exhaust, VOCs, particulate matter, ozone precursors, silica, and acid mists. McCawley reviewed the health effects linked to each of the contaminant types. Though many long-term effects may not yet be apparent in shale gas regions, “[a]t

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<sup>171</sup> Evans, R. B., Prezant, D., & Huang, Y. C. (2015). Hydraulic fracturing (fracking) and the Clean Air Act. *Chest*, 148(2), 298-300. doi: 10.1378/chest.14-2582

<sup>172</sup> Brandt, A., Millstein, D., Jin, L., & Englander, J. (2015, July 9). Air quality impacts from well stimulation. In: California Council on Science and Technology, *An Independent Scientific Assessment of Well Stimulation in California*, volume 2, chapter 3. Retrieved from <http://ccst.us/publications/2015/vol-II-chapter-3.pdf>

<sup>173</sup> California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (2015, July 1). *Analysis of Oil and Gas Well Stimulation Treatments in California, Volume II*. Retrieved from [http://www.conservation.ca.gov/dog/SB4DEIR/Pages/SB4\\_DEIR\\_TOC.aspx](http://www.conservation.ca.gov/dog/SB4DEIR/Pages/SB4_DEIR_TOC.aspx)

<sup>174</sup> Cart. J. (2015, July 1). State issues toughest-in-the-nation fracking rules. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/lanow/la-me-ln-state-issues-fracking-rules-20150701-story.html>

a minimum, one would expect to see similar rates of respiratory disease to that found near highways with heavy traffic flow.”<sup>175</sup>

- April 21, 2015 – In a study funded by the electric power industry, a research team found that fracking had diminished air quality in rural areas downwind of gas sites in two heavily drilled Pennsylvania counties but that concentrations of VOCs were not as high as expected based on results in other states. Methane levels were higher than previous research had found.<sup>176</sup> The extent to which the results can be generalized to the Marcellus basin as a whole, the authors emphasized, remains uncertain.<sup>177</sup>
- April 15, 2015 – In a review of the literature, Colorado researchers demonstrated that four common chemical air pollutants from drilling and fracking operations—benzene, toluene, ethylbenzene, and xylene (BTEX)—are endocrine disruptors commonly found in ambient air that have the ability to interfere with human hormones at low exposure levels, including at concentrations well below EPA recommended exposure limits. Among the health conditions linked to ambient level exposures to the BTEX family of air pollutants: sperm abnormalities, reduced fetal growth, cardiovascular disease, respiratory dysfunction, and asthma.<sup>178</sup> “This review suggests that BTEX may...have endocrine disrupting properties at low concentrations, presenting an important line of inquiry for future research. BTEX are used globally in consumer products, and are released from motor vehicles and oil and natural gas operations that are increasingly in close proximity to homes, schools, and other places of human activity.”<sup>179</sup>
- March 31, 2015 – University of Wyoming researchers identified a wastewater treatment and recycling facility as an important contributor to high winter ozone levels in Wyoming’s Green River Basin. The facility released a signature mixture of volatile hydrocarbons, including toluene and xylene, which are ozone precursors.<sup>180</sup> This study documented that recycling activities can transfer volatile pollutants from water into air when fracking wastewater is cleaned up for reuse and that water treatment emissions can serve as an important point source of air pollutants.<sup>181</sup>

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<sup>175</sup> McCawley, M. (2015). Air contaminants associated with potential respiratory effects from unconventional resource development activities. *Seminars in Respiratory and Critical Care Medicine* 36(3), 379-387. doi: 10.1055/s-0035-1549453

<sup>176</sup> Phillips, S. (2015, May 19). Study: Lower than expected air pollutants detected at Marcellus drilling sites. *State Impact Pennsylvania*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2015/05/19/study-lower-than-expected-air-pollutants-from-gas-drilling-sites/>

<sup>177</sup> Goetz, J. D., Floerchinger, C., Fortner E. C., Wormhoudt, J., Massoli, P., Knighton, W. B., . . . DeCarlo, P.F. (2015). Atmospheric emission characterization of Marcellus Shale natural gas development sites. *Environmental Science & Technology*, 49, 7012-20. doi: 10.1021/acs.est.5b00452

<sup>178</sup> Bienkowski, B. (2015, April 15). Scientists warn of hormone impacts from benzene, xylene, other common solvents. *Environmental Health News*. Retrieved from <http://www.environmentalhealthnews.org/ehs/news/2015/apr/endocrine-disruption-hormones-benzene-solvents>

<sup>179</sup> Bolden, A. L., Kwiatkowski, C. F., & Colborn, T. (2015). New look at BTEX: Are ambient levels a problem? *Environmental Science & Technology*, 49, 5261-76. doi: 10.1021/es505316f

<sup>180</sup> Field, R. A., Soltis, J., McCarthy, M. C., Murphy, S., & Montague, D. C. (2015). Influence of oil and gas field operations on spatial and temporal distributions of atmospheric non-methane hydrocarbons and their effect on ozone formation in winter. *Atmospheric Chemistry and Physics*, 15, 3527-3542. doi: 10.5194/acp-15-3527-2015

<sup>181</sup> Peterka, A. (2015, April 2). Study links Wyo. winter ozone to drillers’ wastewater plant. *Greenwire*. Retrieved from <http://www.eenews.net/stories/1060016205>



- March 26, 2015 – Fracking can pollute air hundreds of miles downwind from the well pad, according to the results of a study from University of Maryland. Researchers took hourly measurements of ethane in the air over Maryland and the greater Washington, DC area, where fracking does not occur, and compared them to ethane data from areas of West Virginia, Pennsylvania, and Ohio where it does. They found month-to-month correlations, indicating that the ethane pollution in the air over Maryland appears to be coming from drilling and fracking operations in these other states. Ethane, a minor component of natural gas, rose 30 percent in the air over the Baltimore and Washington DC area since 2010, even as other air pollutants declined in concentration. By contrast, no increase in ethane levels were found in Atlanta, Georgia, which is not downwind of fracking operations.<sup>182, 183</sup> Given this evidence for widespread ethane leakage, the paper’s lead author asked how much methane and other, more reactive emissions might be escaping from wells, noting that “a substantial amount of hydrocarbons” are emitted as a result of flowback procedures following the fracturing process.<sup>184</sup>
- February 27, 2015 – A team of researchers from University of Texas, funded in part by the gas industry, examined ozone (smog) production resulting from natural gas extraction and use in Texas. Previous research by this team had found that the increased use of natural gas for generating electricity, as a replacement for coal, contributed to overall reductions in daily maximum ozone concentrations in northeastern Texas. By contrast, the results of this study found an increase in ozone in the Eagle Ford Shale area of south Texas. The Eagle Ford Shale is upwind from both Austin and San Antonio.<sup>185</sup> A potent greenhouse gas, methane is also a precursor for ground-level ozone and hence a contributor to smog formation.
- January 16, 2015 – Researchers from a number of universities, including the University of New Hampshire and Appalachian State University, used a source apportionment model to estimate the contribution of natural gas extraction activities to overall air pollution, including ozone, in heavily drilled southwest Pennsylvania. This regional air sampling effort demonstrated significant changes in atmospheric chemistry from drilling and fracking operations there. The researchers found that drilling and fracking operations may affect compliance with ozone standards.<sup>186</sup>

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<sup>182</sup> Vinciguerra, T. Yao, S., Dadzie, J., Chittmans, A., Deskins, T., Ehrman, S., & Dickerson, R. R. (2015). Regional air quality impacts of hydraulic fracturing and shale natural gas activities: evidence from ambient VOC observations. *Atmospheric Environment*, 110, 144-50. doi: 10.1016/j.atmosenv.2015.03.056

<sup>183</sup> Valentine, K. (2015, April 30). Fracking wells could pollute the air hundreds of miles away. *ClimateProgress*. Retrieved from <http://thinkprogress.org/climate/2015/04/30/3653252/fracking-air-pollution-downwind/>

<sup>184</sup> Levine, F., & Tune, L. (2015, April 30). Emissions from natural gas wells may travel far downwind. *University of Maryland: UMD Right Now*. Retrieved from <http://www.umdrightnow.umd.edu/news/emissions-natural-gas-wells-may-travel-far-downwind>

<sup>185</sup> Pacsi, A. P., Kimura, Y., McGaughey, G., McDonald-Buller, E. C., & Allen, D. T. (2015). Regional ozone impacts of increased natural gas use in the Texas power sector and development in the Eagle Ford Shale. *Environmental Science & Technology*, 49, 3966-73. doi: 10.1021/es5055012

<sup>186</sup> Swarthout, R. F., Russo, R.S., Zhou, Y., Miller, B.M., Mitchell, B., Horsman, E., . . . Sive, B.C. (2015). Impact of Marcellus Shale natural gas development in southwest Pennsylvania on volatile organic compound emissions and regional air quality. *Environmental Science & Technology*, 49, 3175-84. doi: 10.1021/es504315f

- November 20, 2014 – The Texas Commission on Environmental Quality confirmed high levels of benzene emissions and other VOCs around an oil and gas facility in the Eagle Ford Shale. Symptoms reported by local residents were consistent with those known to be associated with exposure to such chemicals.<sup>187</sup>
- November 14, 2014 – A University of Colorado at Boulder research team found that residential areas in intensely drilled northeastern Colorado have high levels of fracking-related air pollutants, including benzene. In some cases, concentrations exceed those found in large urban centers and are within the range of exposures known to be linked to chronic health effects. According to the study, “High ozone levels are a significant health concern, as are potential health impacts from chronic exposure to primary emissions of non-methane hydrocarbons (NMHC) for residents living near wells.” The study also noted that tighter regulations have not resulted in lower air pollution levels, “Even though the volume of emissions per well may be decreasing, the rapid and continuing increase in the number of wells may potentially negate any real improvements to the air quality situation.”<sup>188</sup>
- October 30, 2014 – A research team assembled by University at Albany Institute for Health and the Environment identified eight highly toxic chemicals in air samples collected near fracking and associated infrastructure sites across five states: Arkansas, Colorado, Pennsylvania, Ohio, and Wyoming. The most common airborne chemicals detected included two proven human carcinogens (benzene and formaldehyde) and two potent neurotoxins (hexane and hydrogen sulfide). In 29 out of 76 samples, concentrations far exceeded federal health and safety standards, sometimes by several orders of magnitude. Further, high levels of pollutants were detected at distances exceeding legal setback distances from wellheads to homes. Highly elevated levels of formaldehyde, for example, were found up to a half-mile from a wellhead. In Arkansas, seven air samples contained formaldehyde at levels up to 60 times the level known to raise the risk for cancer.<sup>189</sup> “This is a significant public health risk,” said lead author David O. Carpenter, MD, in an accompanying interview: “Cancer has a long latency, so you’re not seeing an elevation in cancer in these communities. But five, 10, 15 years from now, elevation in cancer is almost certain to happen.”<sup>190</sup>
- October 21, 2014 – Responding to health concerns by local residents, a research team from University of Cincinnati and Oregon State University found high levels of air

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<sup>187</sup> Davis, B. (2014, November 20). TCEQ memo proves toxic chemicals are being released in the Eagle Ford Shale. *KENS 5 Eyewitness News*. Retrieved from <http://www.kens5.com/story/news/investigations/i-team/2014/11/20/benzene-oil-toxic-fumes/70020596/>

<sup>188</sup> Thompson, C. R., Hueber J., & Helmig D. (2014). Influence of oil and gas emissions on ambient atmospheric non-methane hydrocarbons in residential areas of Northeastern Colorado. *Elementa: Science of the Anthropocene*, 2. doi: 10.12952/journal.elementa.000035

<sup>189</sup> Macey, G. P., Breech, R., Chernaik, M., Cox, C., Larson, D., Thomas, D., & Carpenter, D. O. (2014). Air concentrations of volatile compounds near oil and gas production: a community-based exploratory study. *Environmental Health*, 13(82). doi: 10.1186/1476-069X-13-82

<sup>190</sup> Neuhauser, A. (2014, October 30). Toxic chemicals, carcinogens skyrocket near fracking sites. *U.S. News and World Report*. Retrieved from <http://www.usnews.com/news/articles/2014/10/30/toxic-chemicals-and-carcinogens-skyrocket-near-fracking-sites-study-says>

pollution in heavily drilled areas of rural Carroll County, Ohio. Air monitors showed 32 different hydrocarbon-based air pollutants, including the carcinogens naphthalene and benzo[a]pyrene.<sup>191</sup> The researchers plan additional monitoring and analysis.

- October 21, 2014 – Using a mobile laboratory designed by NOAA, a research team from the University of Colorado at Boulder, the NOAA Earth System Research Laboratory, and the Karlsruhe Institute of Technology looked at air pollution from drilling and fracking operations in Utah’s Uintah Basin. The researchers found that drilling and fracking emit prodigious amounts of volatile organic air pollutants, including benzene, toluene, and methane, all of which are precursors for ground-level ozone (smog). Multiple pieces of equipment on and off the well pad, including condensate tanks, compressors, dehydrators, and pumps, served as the sources of these emissions. This research shows that drilling and fracking activities are the cause of the extraordinarily high levels of winter smog in the remote Uintah basin—which regularly exceed air quality standards and rival that of downtown Los Angeles.<sup>192</sup>
- October 2, 2014 – A joint investigation by *InsideClimate News* and the Center for Public Integrity found that toxic air emissions wafting from fracking waste pits in Texas are unmonitored and unregulated due to federal exemptions that classify oil and gas field waste as non-hazardous.<sup>193</sup>
- October 1, 2014 – In a major paper published in *Nature*, an international team led by the National Oceanic and Atmospheric Administration demonstrated that exceptionally high emissions of VOCs explain how drilling and fracking operations in Utah’s Uintah Basin create extreme wintertime ozone events even in the absence of abundant ultraviolet light and water vapor, which are typically required to produce ground-level ozone (smog). Current air pollution trends in the United States are toward lower nitrogen oxides from urban sources and power generation, but increasing methane and VOCs from oil and gas extraction activities threaten to reverse decades of progress in attaining cleaner air. According to the study, the consequences for public health are “as yet unrecognized.”<sup>194</sup>
- September 6, 2014 – As part of a comparative lifecycle analysis, a British team from the University of Manchester found that shale gas extracted via fracking in the United Kingdom would generate more smog than any other energy source evaluated (coal,

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<sup>191</sup> Environmental Health Sciences Center, Oregon State University. (2014). List of 62 PAH analyzed in Carroll County, OH. Retrieved from <http://ehsc.oregonstate.edu/air/62PAH>

<sup>192</sup> Warneke, C., Geiger, F., Edwards, P. M., Dube, W., Pétron, G., Kofler, J., . . . Roberts, J. M. (2014). Volatile organic compound emissions from the oil and natural gas industry in the Uintah Basin, Utah: oil and gas well pad emissions compared to ambient air composition. *Atmospheric Chemistry and Physics*, 14, 10977-10988. doi: 10.5194/acp-14-10977-2014

<sup>193</sup> Hasemyer, D., & Hirji, Z. (2014, October 2). Open piles offer cheap disposal for fracking sludge, but health worries mount. *InsideClimate News* and the Center for Public Integrity. Retrieved from <http://www.publicintegrity.org/2014/10/02/15826/open-pits-offer-cheap-disposal-fracking-sludge-health-worries-mount>

<sup>194</sup> Edwards, P. M., Brown, S. S., Roberts, J. M., Ahmadov, R., Banta, R. M., deGouw, J.A., . . . Zamora, R. (2014). High winter ozone pollution from carbonyl photolysis in an oil and gas basin. *Nature*, 514(7522), 351-354. doi: 10.1038/nature13767

conventional and liquefied gas, nuclear, wind, and solar). Leakage of vaporous organic compounds during the necessary removal of hydrogen sulfide gas, along with the venting of gas both during drilling and during the process of making the well ready for production, were major contributors. “In comparison to other technologies, shale gas has high [photochemical smog]. In the central case, it is worse than solar PV, offshore wind and nuclear power by factors of 3, 26 and 45, respectively. Even in the best case, wind and nuclear power are still preferable (by factors of 3.3 and 5.6 respectively).”<sup>195</sup>

- September 2014 – ShaleTest Environmental Testing conducted ambient air quality tests and gas-finder infrared video for several children’s play areas in North Texas that are located in close proximity to shale gas development. The results showed a large number of compounds detected above the Method Reporting Limit (the minimum quantity of the compound that can be confidently determined by the laboratory). Air sampling found three known/suspected carcinogens, and a number of other compounds associated with significant health effects. Benzene results from Denton, Dish, and Fort Worth are particularly alarming since they exceeded the long-term ambient air limits set by the Texas Commission on Environmental Quality, and benzene is a known carcinogen. “Benzene was found at all but one sampling location .... This is particularly noteworthy as benzene is a known carcinogen (based on evidence from studies in both people and lab animals), AND because it exceeds [levels above which effects have the potential to occur.]”<sup>196</sup>
- August 24, 2014 – A *Salt Lake City Tribune* investigation found that evaporation from 14 fracking waste pits in western Colorado has added tons of toxic chemicals to Utah’s air in the last six years. Further, the company responsible operated with no permit, underreported its emissions and provided faulty data to regulators.<sup>197</sup>
- August 2014 – A four-part investigation by the *San Antonio Express-News* found that natural gas flaring in the Eagle Ford Shale in 2012 contributed more than 15,000 tons of VOCs and other contaminants to the air of southern Texas—which is roughly equivalent to the pollution that would be released annually by six oil refineries. No state or federal agency is tracking the emissions from individual flares.<sup>198</sup>
- June 26, 2014 – Public health professionals at the Southwest Pennsylvania Environmental Health Project reported significant recurrent spikes in the amount of particulate matter in the air inside of residential homes located near drilling and fracking operations. Captured by indoor air monitors, the spikes tend to occur at night when stable atmospheric conditions hold particulate matter low to the ground. Director Raina Ripple emphasized

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<sup>195</sup> Stamford, L., & Azapagic, A. (2014). Life cycle environmental impacts of UK shale gas. *Applied Energy*, 134, 506-518. doi: 10.1016/j.apenergy.2014.08.063

<sup>196</sup> ShaleTest Environmental Testing. (2014, September). Project playground: Cleaner air for active kids. Retrieved from <http://www.shaletest.org/wp-content/uploads/2014/09/ProjectPlaygroundPatagoniaReport-5-1.pdf>

<sup>197</sup> Maffly, B. (2014, August 24). Utah grapples with toxic water from oil and gas industry. *Salt Lake City Tribune*. Retrieved from <http://www.sltrib.com/sltrib/news/58298470-78/danish-flats-ponds-company.html>

<sup>198</sup> Hiller, J., & Tedesco, J. (2014, August). Up in flames: Flare in Eagle Ford Shale wasting natural gas. *San Antonio Express News*. Retrieved from: <http://www.expressnews.com/business/eagleford/item/Up-in-Flames-Day-1-Flares-in-Eagle-Ford-Shale-32626.php>

that spikes in airborne particulate matter are likely to cause acute health impacts in community members. She added, “What the long-term effects are going to be, we’re not certain.”<sup>199</sup>

- May 8, 2014 – Researchers at NOAA found high levels of methane leaks as well as benzene and smog-forming VOCs in the air over oil and gas drilling areas in Colorado. Researchers found methane emissions three times higher than previously estimated and benzene and VOC levels seven times higher than estimated by government agencies. The *Denver Post* noted that Colorado’s Front Range has failed to meet federal ozone air quality standards for years.<sup>200</sup>
- April 26, 2014 – A Texas jury awarded a family \$2.8 million because, according to the lawsuit, a fracking company operating on property nearby had “created a ‘private nuisance’ by producing harmful air pollution and exposing [members of the affected family] to harmful emissions of volatile organic compounds, toxic air pollutants and diesel exhaust.” The family’s 11-year-old daughter became ill, and family members suffered a range of symptoms, including “nosebleeds, vision problems, nausea, rashes, blood pressure issues.”<sup>201</sup> Because drilling did not occur on their property, the family had initially been unaware that their symptoms were caused by activities around them.
- April 16, 2014 – Reviewing the peer-review literature to date of “direct pertinence to the environmental public health and environmental exposure pathways,” a U.S. team of researchers concluded: “[a] number of studies suggest that shale gas development contributes to levels of ambient air concentrations known to be associated with increased risk of morbidity and mortality.”<sup>202</sup>
- April 11, 2014 – A modeling study commissioned by the state of Texas made striking projections about worsening air quality in the Eagle Ford Shale. Findings included the possibility of a 281 percent increase in emissions of VOCs. Some VOCs cause respiratory and neurological problems; others, like benzene, are also carcinogens. Another finding was that nitrogen oxides—which react with VOCs in sunlight to create ground-level ozone, the main component of smog—increased 69 percent during the peak ozone season.<sup>203</sup>
- March 29, 2014 – Scientists warn that current methods of collecting and analyzing emissions data do not accurately assess health risks. Researchers with the Southwest

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<sup>199</sup> McMahon, J. (2014, June 26). Air pollution spikes in homes near fracking wells. *Forbes*. Retrieved from <http://www.forbes.com/sites/jeffmcmahon/2014/06/26/air-pollution-spikes-in-homes-near-fracking-wells/>

<sup>200</sup> Finley, B. (2014, May 8). Scientists flying over Colorado oil boom find worse air pollution. *The Denver Post*. Retrieved from [http://www.denverpost.com/environment/ci\\_25719742/scientists-flying-over-colorado-oil-boom-find-worse](http://www.denverpost.com/environment/ci_25719742/scientists-flying-over-colorado-oil-boom-find-worse)

<sup>201</sup> Morris, J. (2014, April 26). Texas family plagued with ailments gets \$3M in 1st-of-its-kind fracking judgment. *CNN*. Retrieved from <http://www.cnn.com/2014/04/25/justice/texas-family-wins-fracking-lawsuit/>

<sup>202</sup> Shonkoff, S. B., Hays, J., & Finkel, M. L. (2014). Environmental public health dimensions of shale and tight gas development. *Environmental Health Perspectives*, 122, 787–795. doi: 10.1289/ehp.1307866

<sup>203</sup> Morris, J., Song, L., & Hasemayer, D. (2014, April 11). Report: Air quality to worsen in Eagle Ford shale. *The Texas Tribune*. Retrieved from <http://www.texastribune.org/2014/04/11/report-air-quality-worsen-eagle-ford-shale/>

Pennsylvania Environmental Health Project showed that methods do not adequately measure the intensity, frequency, or durations of community exposure to the toxic chemicals routinely released from drilling and fracking activities. They found that exposures may be underestimated by an order of magnitude, mixtures of chemicals are not taken into account, and local weather conditions and vulnerable populations are ignored.<sup>204</sup>

- March 27, 2014 – University of Texas research pointed to “potentially false assurances” in response to community health concerns in shale gas development areas. Dramatic shortcomings in air pollution monitoring to date include no accounting for cumulative toxic emissions or children’s exposures during critical developmental stages, and the potential interactive effects of mixtures of chemicals. Chemical mixtures of concern include benzene, toluene, ethylbenzene, and xylenes.<sup>205, 206</sup>
- March 13, 2014 – VOCs emitted in Utah’s heavily drilled Uintah Basin led to 39 winter days exceeding the EPA’s eight-hour National Ambient Air Quality Standards level for ozone pollutants the previous winter. “Levels above this threshold are considered to be harmful to human health, and high levels of ozone are known to cause respiratory distress and be responsible for an estimated 5,000 premature deaths in the U.S. per year,” according to researchers at the University of Colorado. Their observations “reveal a strong causal link between oil and gas emissions, accumulation of air toxics, and significant production of ozone in the atmospheric surface layer.”<sup>207</sup> Researchers estimated that total annual VOC emissions at the fracking sites are equivalent to those of about 100 million cars.<sup>208</sup>
- March 3, 2014 – In a report summarizing “the current understanding of local and regional air quality impacts of natural gas extraction, production, and use,” a group of researchers from NOAA, Stanford, Duke, and other institutions described what is known and unknown with regard to air emissions including greenhouse gases, ozone precursors (VOCs and nitrogen oxides), air toxics, and particulates. Crystalline silica was also discussed, including as a concern for people living near well pads and production staging areas.<sup>209</sup>

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<sup>204</sup> Brown, D., Weinberger, B., Lewis, C., & Bonaparte, H. (2014). Understanding exposure from natural gas drilling puts current air standards to the test. *Reviews on Environmental Health*, 29(4), 277-92. doi: 10.1515/reveh-2014-0002

<sup>205</sup> Rawlins, R. (2013). Planning for fracking on the Barnett shale: Urban air pollution, improving health based regulation, and the role of local governments. *Virginia Environmental Law Journal*, 31, 226-306. Retrieved from [http://www.velj.org/uploads/1/2/7/0/12706894/2.\\_rawlins\\_-\\_barnett\\_shale.pdf](http://www.velj.org/uploads/1/2/7/0/12706894/2._rawlins_-_barnett_shale.pdf)

<sup>206</sup> University of Texas at Austin. (2014, March 27). Air pollution and hydraulic fracturing: Better monitoring, planning and tracking of health effects needed in Texas. Retrieved from <http://www.utexas.edu/news/2014/03/27/hydraulic-fracturing-texas/>

<sup>207</sup> Helmig, D., Thompson, C. R., Evans, J., Boylan, P., Hueber, J., & Park, J. (2014). Highly elevated atmospheric levels of volatile organic compounds in the Uintah Basin, Utah [Abstract]. *Environmental Science & Technology*, 48(9), 4707-4715. doi: 10.1021/es405046r

<sup>208</sup> Lockwood, D. (2014, March 25). Harmful air pollutants build up near oil and gas fields. *Chemical & Engineering News*. Retrieved from <http://cen.acs.org/articles/92/web/2014/03/Harmful-Air-Pollutants-Build-Near.html>

<sup>209</sup> Moore, C. W., Zielinska, B., Petron, G., & Jackson, R. B. (2014). Air impacts of increased natural gas acquisition, processing, and use: A critical review. *Environmental Science & Technology*. doi: 10.1021/es4053472

- February 18, 2014 – An eight-month investigation by the *Weather Channel*, the *Center for Public Integrity*, and *InsideClimate News* into fracking in the Eagle Ford Shale in Texas revealed that fracking is “releasing a toxic soup of chemicals into the air.” They noted very poor monitoring by the state of Texas and reported on hundreds of air complaints filed relating to air pollution associated with fracking.<sup>210</sup>
- December 18, 2013 – An interdisciplinary group of researchers in Texas collected air samples in residential areas near shale gas extraction and production, going beyond previous Barnett Shale studies by including emissions from the whole range of production equipment. They found that most areas had “atmospheric methane concentrations considerably higher than reported urban background concentrations,” and many toxic chemicals were “strongly associated” with compressor stations.<sup>211</sup>
- December 10, 2013 – Health department testing at fracking sites in West Virginia revealed dangerous levels of benzene in the air. Wheeling-Ohio County Health Department Administrator Howard Gamble stated, “The levels of benzene really pop out. The amounts they were seeing were at levels of concern. The concerns of the public are validated.”<sup>212</sup>
- October 11, 2013 – Air sampling before, during, and after drilling and fracking of a new natural gas well pad in rural western Colorado documented the presence of the toxic solvent methylene chloride, along with several polycyclic aromatic hydrocarbons at “concentrations greater than those at which prenatally exposed children in urban studies had lower developmental and IQ scores.”<sup>213</sup>
- September 19, 2013 – In Texas, air monitoring data in the Eagle Ford Shale area revealed potentially dangerous exposures of nearby residents to hazardous air pollutants, including cancer-causing benzene and the neurological toxicant, hydrogen sulfide.<sup>214</sup>
- September 13, 2013 – A study by researchers at the University of California at Irvine found dangerous levels of VOCs in Canada’s “Industrial Heartland” where there are more than 40 oil, gas, and chemical facilities. The researchers noted high levels of

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<sup>210</sup> Morris, J., Song, L., & Hasemayer, D. (2014, February 18). Fracking the Eagle Ford Shale. *The Weather Channel*. Retrieved from <http://stories.weather.com/fracking>

<sup>211</sup> Rich, A., Grover, J. P., & Sattler, M. L. (2014). An exploratory study of air emissions associated with shale gas development and production in the Barnett Shale. *Journal of the Air & Waste Management Association*, 64(1), 61-72. doi: 10.1080/10962247.2013.832713

<sup>212</sup> Junkins, C. (2013, December 10). Health dept. concerned about benzene emissions near local gas drilling sites. *The Intelligencer, Wheeling News-Register*. Retrieved from <http://www.theintelligencer.net/page/content.detail/id/593209/Health-Dept--Concerned-About-Benzene-Emissions-Near-Local-Gas-Drilling-Sites.html?nav=510>

<sup>213</sup> Colborn, T., Schultz, K., Herrick, L., & Kwiatkowski, C. (2014). An exploratory study of air quality near natural gas operations. *Human and Ecological Risk Assessment: An International Journal*, 20(1), 86-105. doi: 10.1080/10807039.2012.749447

<sup>214</sup> Wilson, S., Sumi, L., & Subra, W. (2013, September 19). Reckless endangerment while fracking the Eagle Ford shale. *Earthworks*. Retrieved from [http://www.earthworksaction.org/library/detail/reckless\\_endangerment\\_in\\_the\\_eagle\\_ford\\_shale#.UkGi-4Y3uSo](http://www.earthworksaction.org/library/detail/reckless_endangerment_in_the_eagle_ford_shale#.UkGi-4Y3uSo).

hematopoietic cancers (leukemia and non-Hodgkin's lymphoma) in men who live closer to the facilities.<sup>215</sup>

- April 29, 2013 – Using American Lung Association data, researchers with the Environmental Defense Fund determined that air quality in rural areas with fracking was worse than air quality in urban areas.<sup>216</sup>
- March 2013 – A review of regional air quality damages in parts of Pennsylvania in 2012 from Marcellus Shale development found that air pollution was a significant concern, with regional damages ranging from \$7.2-\$32 million in 2011.<sup>217</sup>
- February 27, 2013 – In a letter from Concerned Health Professionals of New York to Governor Andrew Cuomo, a coalition of hundreds of health organizations, scientists, medical experts, elected officials, and environmental organizations noted serious health concerns about the prospects of fracking in New York State, making specific note of air pollution.<sup>218</sup> Signatory organizations included the American Academy of Pediatrics of New York, the American Lung Association of New York, and Physicians for Social Responsibility. The New York State Medical Society, representing 30,000 medical professionals, has issued similar statements.<sup>219</sup>
- January 2, 2013 – A NOAA study identified emissions from oil and gas fields in Utah as a significant source of pollutants that contribute to ozone problems.<sup>220</sup> Exposure to elevated levels of ground-level ozone is known to worsen asthma and has been linked to respiratory illnesses and increased risk of stroke and heart attack.<sup>221</sup>
- December 3, 2012 – A study linked a single well pad in Colorado to more than 50 airborne chemicals, 44 of which have known health effects.<sup>222</sup>

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<sup>215</sup> Simpson, I. J., Marrero, J. E., Batterman, S. & Blake, D. R. (2013) Air quality in the Industrial Heartland of Alberta, Canada and potential impacts on human health. *Atmospheric Environment*, 81, 702-709. doi: 10.1016/j.atmosenv.2013.09.017

<sup>216</sup> Grossman, D. (2013, April 29). Clean air report card: CO, WY Counties get F's due to oil and gas pollution. *Environmental Defense Fund*. Retrieved from <http://blogs.edf.org/energyexchange/2013/04/29/clean-air-report-card-co-wy-counties-get-fs-due-to-oil-and-gas-pollution/#sthash.FXRv6Nxi.dpuf>

<sup>217</sup> Litovitz, A., Curtright, A., Abramzon, S., Burger, N., & Samaras, C. (2013). Estimation of regional air-quality damages from Marcellus Shale natural gas extraction in Pennsylvania. *Environmental Research Letters*, 8(1). doi: 10.1088/1748-9326/8/1/014017

<sup>218</sup> Concerned Health Professionals of NY. (2013, February 27). Letter to Governor Cuomo. Retrieved from <http://concernedhealthny.org/letters-to-governor-cuomo/>

<sup>219</sup> Campbell, J. (2013, April 17). Fracking roundup: Gas prices up; Medical society wants moratorium. *Politics on the Hudson*. Retrieved from <http://polhudson.lohudblogs.com/2013/04/17/fracking-roundup-gas-prices-up-medical-society-wants-moratorium/>

<sup>220</sup> Tollefson, J. (2013). Methane leaks erode green credentials of natural gas. *Nature*, 493(7430), 12-12. doi: 10.1038/493012a

<sup>221</sup> American Lung Association. (2013). American Lung Association state of the air 2013 - Ozone pollution. Retrieved from <http://www.stateoftheair.org/2013/health-risks/health-risks-ozone.html>

<sup>222</sup> Colborn, T., Schultz, K., Herrick, L., & Kwiatkowski, C. (2014). An exploratory study of air quality near natural gas operations. *Human and Ecological Risk Assessment: An International Journal*, 20(1), 86-105. doi: 10.1080/10807039.2012.749447



- July 18, 2012 – A study by the Houston Advanced Research Center modeled ozone formation from a natural gas processing facility using accepted emissions estimates and showed that regular operations could significantly raise levels of ground-level ozone (smog) in the Barnett Shale in Texas and that gas flaring further contributed to ozone levels.<sup>223</sup>
- March 19, 2012 – A Colorado School of Public Health study found air pollutants near fracking sites linked to neurological and respiratory problems and cancer.<sup>224, 225</sup> The study, based on three years of monitoring at Colorado sites, found a number of “potentially toxic petroleum hydrocarbons in the air near gas wells including benzene, ethylbenzene, toluene, and xylene.” Lisa McKenzie, PhD, MPH, lead author of the study and research associate at the Colorado School of Public Health, said, “Our data show that it is important to include air pollution in the national dialogue on natural gas development that has focused largely on water exposures to hydraulic fracturing.”<sup>226</sup>
- December 12, 2011 – Cancer specialists, cancer advocacy organizations, and health organizations summarized the cancer risks posed by all stages of the shale gas extraction process in a letter to New York Governor Andrew Cuomo.<sup>227</sup>
- October 5, 2011 – More than 250 medical experts and health organizations reviewed the multiple health risks from fracking in a letter sent to New York Governor Andrew Cuomo.<sup>228</sup>
- April 21, 2011 – *Environment & Energy (E&E)* reported that ozone levels exceeding federal health standards in Utah’s Uintah Basin, as well as wintertime ozone problems in other parts of the Intermountain West, stem from oil and gas extraction. Levels reached nearly twice the federal standard, potentially dangerous even for healthy adults to breathe. Keith Guille, spokesman for the Wyoming Department of Environmental Quality, said, “We recognize that definitely the main contributor to the emissions that are out there is the oil and gas industry....”<sup>229</sup>

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<sup>223</sup> Olaguer, E. P. (2012). The potential near-source ozone impacts of upstream oil and gas industry emissions. *Journal of the Air & Waste Management Association*, 62(8), 966-977. doi: 10.1080/10962247.2012.688923

<sup>224</sup> Kelly, D. (2012, March 19). Study shows air emissions near fracking sites may pose health risk. *University of Colorado Denver*. Retrieved from <http://www.ucdenver.edu/about/newsroom/newsreleases/Pages/health-impacts-of-fracking-emissions.aspx>

<sup>225</sup> McKenzie, L. M., Witter, R. Z., Newman, L. S., & Adgate, J. L. (2012). Human health risk assessment of air emissions from development of unconventional natural gas resources. *Science of the Total Environment*, 424, 79-87. doi: 10.1016/j.scitotenv.2012.02.018

<sup>226</sup> Banerjee, N. (2012, March 20). Study: 'Fracking' may increase air pollution health risks. *Los Angeles Times*. Retrieved from <http://articles.latimes.com/2012/mar/20/local/la-me-gs-fracking-increases-air-pollution-health-risks-to-residents-20120320>

<sup>227</sup> Physicians, Scientists & Engineers for Healthy Energy. (2011, December 12). Appeal to Gov. Cuomo to consider cancer risks re: High volume hydraulic fracturing for natural gas [Letter to A. Cuomo].

<sup>228</sup> Physicians, Scientists & Engineers for Healthy Energy. (2011, October 5). Letter to Governor Cuomo [Letter to A. Cuomo].

<sup>229</sup> Streater, S. (2011, April 21). Air pollution: Winter ozone problem continues to mystify regulators, industry. *E&E Publishing, LLC*. Retrieved from <http://www.eenews.net/stories/1059948108>

- March 8, 2011 – The Associated Press reported that gas drilling in some remote areas of Wyoming caused a decline of air quality from pristine mountain air to levels of smog and pollution worse than Los Angeles on its worst days, resulting in residents complaining of watery eyes, shortness of breath, and bloody noses.<sup>230</sup>
- November 18, 2010 – A study of air quality in the Haynesville Shale region of east Texas, northern Louisiana, and southwestern Arkansas found that shale oil and gas extraction activities contributed significantly to ground-level ozone (smog) via high emissions of ozone precursors, including VOCs and nitrogen oxides.<sup>231</sup> Ozone is a key risk factor for asthma and other respiratory and cardiovascular illnesses.<sup>232, 233, 234, 235</sup>
- September 2010 – A health assessment by the Colorado School of Public Health for gas development in Garfield County, Colorado determined that air pollution will likely “be high enough to cause short-term and long-term disease, especially for residents living near gas wells. Health effects may include respiratory disease, neurological problems, birth defects and cancer.”<sup>236, 237</sup>
- January 27, 2010 – Of 94 drilling sites tested for benzene in air over the Barnett Shale, the Texas Commission on Environmental Quality discovered two well sites emitting what they determined to be “extremely high levels” and another 19 emitting elevated levels.<sup>238</sup>

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<sup>230</sup> Gruver, M. (2011, March 8). Wyoming is beset by a big-city problem: Smog. *USA Today*. Retrieved from [http://usatoday30.usatoday.com/money/industries/energy/2011-03-08-natural-gas-ozone-wyoming\\_N.htm](http://usatoday30.usatoday.com/money/industries/energy/2011-03-08-natural-gas-ozone-wyoming_N.htm)

<sup>231</sup> Kembell-Cook, S., Bar-Ilan, A., Grant, J., Parker, L., Jung, J., Santamaria, W., . . . Yarwood, G. (2010). Ozone impacts of natural gas development in the Haynesville Shale. *Environmental Science & Technology*, 44(24), 9357-9363. doi: 10.1021/es1021137

<sup>232</sup> U.S. Environmental Protection Agency. (2013). Integrated science assessment for ozone and related photochemical oxidants. Retrieved from <http://www.epa.gov/ncea/isa/ozone.htm>

<sup>233</sup> Shah, A. S., Lee, K. K., McAllister, D. A., Hunter, A., Nair, H., Whiteley, W., . . . Mills, N. L. (2015). Short term exposure to air pollution and stroke: systematic review and meta-analysis. *British Medical Journal*, 24(1295). doi: 10.1136/bmj.h1295

<sup>234</sup> Shah, A. S., Langrish, J. P., Nair, H., McAllister, D. A., Hunter, A., L., Donaldson, K., . . . Mills, N. L. (2013). Global association of air pollution and heart failure: a systematic review and meta-analysis. *The Lancet*, 382(9897), 1039-1048. doi: 10.1016/S0140-6736(13)60898-3.

<sup>235</sup> Myers, O., Flowers, H., Kang, H., Bedrick, E., Whorton, B., Cui, X., & Stidley, C. A. (2007). The association between ambient air quality ozone levels and medical visits for asthma in San Juan County. New Mexico Department of Health, Environmental Health Epidemiology Bureau Epidemiology and Response Division. Retrieved from <http://www.nmenv.state.nm.us/aqb/4C/Documents/SanJuanAsthmaDocBW.pdf>

<sup>236</sup> Witter, R., McKenzie, L., Towle, M., Stinson, K., Scott, K., Newman, L., & Adgate, J. (2010). Health impact assessment for Battlement Mesa, Garfield County Colorado. *Colorado School of Public Health*. Retrieved from <http://www.garfield-county.com/public-health/documents/1%20%20Complete%20HIA%20without%20Appendix%20D.pdf>

<sup>237</sup> Battlement Mesa HIA/EHMS. (2013, November 30). Retrieved from <http://www.garfield-county.com/environmental-health/battlement-mesa-health-impact-assessment-draft2.aspx>

<sup>238</sup> The Associated Press. (2010, January 27). Texas agency finds high benzene levels on Barnett Shale. Retrieved from [http://www.nola.com/business/index.ssf/2010/01/texas\\_agency\\_finds\\_high\\_benzen.html](http://www.nola.com/business/index.ssf/2010/01/texas_agency_finds_high_benzen.html)

## Water contamination

*Substantial evidence shows that drilling and fracking activities, and associated wastewater disposal practices, inherently threaten groundwater and have polluted drinking water sources. Repudiating industry claims of risk-free fracking, studies from across the United States present irrefutable evidence that groundwater contamination occurs as a result of fracking activities and is more likely to occur close to well pads. In Pennsylvania alone, the state has determined that 343 private drinking water wells have been contaminated or otherwise impacted as the result of drilling and fracking operations over an eight-year period. As determined by the U.S. Agency for Toxic Substances and Disease Registry (ATSDR), the chemical contamination of some private water wells in Dimock, Pennsylvania posed demonstrable health risks, rendering the water unsuitable for drinking.*

*Evidence of instances and pathways of water contamination exist even though scientific inquiry is impeded by industry secrecy and regulatory exemptions. The 2005 Energy Policy Act exempts hydraulic fracturing from key provisions of the Safe Drinking Water Act. As a result, fracking chemicals have been protected from public scrutiny as “trade secrets.” The oil and gas sector is the only U.S. industry permitted to inject known hazardous materials near, or directly into, underground drinking water aquifers. At the same time, in most states where fracking occurs, routine monitoring of groundwater aquifers near drilling and fracking operations is not required, nor are companies compelled to fully disclose the identity of chemicals used in fracking fluid, their quantities, or their fate once injected underground.*

*Nevertheless, of the more than 1,000 chemicals that are confirmed ingredients in fracking fluid, an estimated 100 are known endocrine disruptors, acting as reproductive and developmental toxicants. Adding to this mix are heavy metals, radioactive elements, brine, and volatile organic compounds (VOCs), which occur naturally in deep geological formations and which can be carried up from the fracking zone with the flowback fluid. As components of the fracking waste stream, these toxic substances also pose threats to surface water and groundwater. A 2017 study found that spills of fracking fluids and fracking wastewater are common, documenting 6,678 significant spills occurring over a period of nine years in four states alone. In these states, between 2 and 16 percent of wells report spills each year. About five percent of all fracking waste is lost to spills, often during transport.*

*Spills and intentional discharges of fracking waste into surface water have profoundly altered the chemistry and ecology of streams throughout entire watersheds, increasing downstream levels of radioactive elements, heavy metals, endocrine disruptors, toxic disinfection byproducts, and acidity, and decreasing aquatic biodiversity and populations of zooplankton and sensitive fish species, such as brook trout. Recent studies documenting changes in the bacterial flora in groundwater following drilling and fracking operations represent an emerging area of concern.*

*Demand for water to use in U.S. fracking operations continues to rise and has more than doubled since 2016. Unlike water used for agriculture or other industrial uses, the water used for fracking that remains in the shale bedrock is permanently lost to the hydrologic cycle. A suite of new studies now show that fracking can deplete streams and aquifers in ways that contribute to water stress and water scarcity. A 2018 study found that water use for fracking*

*operations increased by 770 percent per well between 2011 and 2016 across all U.S. shale basins. At the same time, the volume of fracking wastewater generated during the first year of extraction increased by up to 1440 percent. There is no known solution for the problem of fracking wastewater. It cannot be filtered to create clean, drinkable water, nor is there any safe method of disposal. Recycling is an expensive, limited option that increases radionuclide levels of subsequent wastewater. Underground reservoirs that receive fracking wastewater via injection into disposal wells, a practice that is linked to earthquakes, are reaching capacity in many regions of the United States.*

- March 28, 2019 – Chemical surfactants are added to fracking fluid to emulsify, reduce surface tension, and inhibit corrosion. An engineering team looked at the chemical fate of these additives when they come back to the surface as shale gas wastewater. They found that high dissolved solids (salts) in the wastewater inhibit microbes that assist in biodegradation. “The presence of higher total dissolved solids appeared to exert an appreciable, long-standing effect on microbial community composition within one week of exposure to increased salinity, suggesting that an accidental release of recycled produced water may upset naturally occurring microbial communities.” These results imply that accidental spills of shale gas wastewater—or deliberate releases (as when fracking wastewater is used for de-icing roads or irrigation)—are likely to result in the environmental persistence of these surfactant chemicals. These findings have implications for treating and recycling fracking wastewater. Its high salt levels mean that it must be filtered through special desalinating membranes, but the persistent presence of surfactant chemicals can clog and damage these membranes.<sup>239</sup>
- March 14, 2019 – Rainbow trout exposed to levels of fracking wastewater that mimic those that would result from a low-level spill, as from a pipeline leak into a small river, did not show significant signs of salinity stress. However, their blood plasma did accumulate strontium and bromide. This study did not examine possible endocrine disrupting effects.<sup>240</sup>
- March 5, 2019 – Water fleas (*Daphnia spp.*) are freshwater zooplankton that feed on phytoplankton and play a crucial role in aquatic food webs. In a Canadian study, water fleas exposed to various concentrations of fracking wastewater displayed altered behaviors that impaired their ability to orient toward light, a response that allows them to avoid predation and find food. This study helps explain the results of earlier research that links fracking fluid exposure to decreased water flea survival. Water fleas are unable to detect and avoid fracking fluid spills.<sup>241</sup> (See also entry for April 28, 2018.)

<sup>239</sup> Hanson, A. J., Luek J. L., Tummings, S. S., McLaughlin, M. C., Blotevogel, J., & Mouser, P. J. (2019). High total dissolved solids in shale gas wastewater inhibit biodegradation of alkyl and nonphenol ethoxylate surfactants. *Science of the Total Environment*, 668, 1094-1103. doi: 10.1016/j.scitotenv.2019.03.041

<sup>240</sup> Delompre, P. L. M., Blewett, T. A., Snihur, K. N., Flynn, S. L., Alessi, D. S., Glover, C. N., & Goss, G. G. (2019). The osmotic effect of hyper-saline hydraulic fracturing fluid on rainbow trout, *Oncorhynchus mykiss*. *Aquatic Toxicology*, 211, 1-10. doi: 10.1016/j.aquatox.2019.03.009

<sup>241</sup> Delompre, P. L. M., Blewett, T. A., Goss, G. G., & Glover, C. N. (2019). Shedding light on the effects of hydraulic fracturing flowback and produced water on phototactic behavior in *Daphnia magna*. *Ecotoxicology and Environmental Safety*, 174, 315-323. doi: 10.1016/j.ecoenv.2019.03.006

- February 28, 2019 – An American University team compared water quality parameters in 19 small streams in an intensely fracked area of southwestern Pennsylvania with those of 10 equivalent streams in western Maryland where fracking is banned and has never taken place. Streams in both study areas overlie the Marcellus Shale. Even after accounting for variations in forest cover, urban development, and historical impacts from coal mining, the researchers found significant differences in concentrations of certain salts and heavy metals, including arsenic. The results “imply that water quality has been affected by [shale gas] development in the Marcellus Shale region” and “support the idea that the Pennsylvania streams have received greater pollution inputs than have the Maryland streams.”<sup>242</sup>
- February 11, 2019 – The U.S. Justice Department reached a settlement with Antero Resources Corporation over claims that it violated the Clean Water Act at 32 different drilling and fracking-related sites in West Virginia. The violations involved unauthorized dumping of fracking waste into local waterways.<sup>243</sup>
- February 7, 2019 – The Karoo Basin in South Africa is a semi-arid region underlain by gas-containing shale. Its bedrock is also rich in uranium, and, consequently, the basin has a range of different naturally occurring radioactive materials, including radium and radon gas. As part of a baseline study prior to fracking, a South African team monitored the presence of radon in groundwater in 53 aquifers throughout the Karoo Basin. They found that water in seven sites had levels of radon above levels considered safe by the World Health Organization. They also observed lower levels in cool, deep aquifers and higher levels of radon in warm, shallow aquifers, where seasonal and annual fluctuations were common.<sup>244</sup>
- January 22, 2019 – Demand for water to use in fracking operations for oil extraction has more than doubled since 2016, according to data from Rystad Energy, an energy research intelligence company. In the Permian Basin alone, located in west Texas and southeastern New Mexico, water demand for fracking now exceeds the total U.S. demand in 2016.<sup>245</sup>
- January 7, 2019 – From samples of fracking wastewater in Alberta, a Canadian team isolated a previously unidentified class of contaminants, aryl phosphates, which degrade into diphenyl phosphate. Experiments showed that diphenyl phosphate does not bind to clay-rich soils. Therefore, its transportation into groundwater following fracking waste

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<sup>242</sup> Knee, K. L., & Masker, A. E. (2019). Association between unconventional oil and gas (UOG) development and water quality in small streams overlying the Marcellus Shale. *Freshwater Science*, 38(1). Advance online publication. doi:10.1086/701675

<sup>243</sup> Reuters. (2019, February 11). U.S. settles with Antero over water pollution from fracking. Retrieved from <https://www.reuters.com/article/us-usa-antero/us-settles-with-antero-over-water-pollution-from-fracking-idUSKCN1Q021K>

<sup>244</sup> Botha, R., Lindsay, R., Newman, R. T., Makeka, P. P., & Chimba, G. (2019). Radon in groundwater baseline study prior to unconventional shale gas development and hydraulic fracturing in the Karoo Basin (South Africa). *Applied Radiation and Isotopes*, 147, 7-13. doi: 10.1016/j.apradiso.2019.02.006

<sup>245</sup> Rystad Energy (2019, January 22). Frac water demand is sky-rocketing [Press release]. Retrieved from <https://www.rystadenergy.com/newsevents/news/press-releases/Frac-water-demand-is-sky-rocketing/>

spills would be swift. Further research showed toxic effects of low-level exposure of diphenyl phosphate on fish embryos and embryonic chick tissue. Noting that hundreds of fracking waste spills are reported in Alberta each year, the researchers expressed concern that diphenyl phosphate “may pose an environmental risk to aquatic ecosystems if released into the environment.”<sup>246</sup>

- November 28, 2018 – Drilling and fracking operations in the Marcellus Shale region are known to harm biodiversity and reduce the populations of aquatic invertebrate animals that are the basis of the food chain in streams. A research team working in West Virginia investigated whether an observed population decline in a species of bird, the Louisiana Waterthrush, might be related to loss of these aquatic invertebrates, which are its prey. While the results varied from year to year and loss of food resources did not wholly explain the declines in waterthrush populations in areas of active drilling and fracking, “collective evidence suggests there may be a shale gas disturbance threshold at which waterthrush respond negatively to aquatic prey community changes.”<sup>247</sup>
- November 19, 2018 – Methane can find its way into groundwater through naturally occurring fractures and fissures in shale deposits or through openings created by nearby drilling and fracking operations. A team led by Pennsylvania State University geochemist Susan Brantley sampled methane in drinking water wells in Pennsylvania with and without fracking, focusing on an area where fracking wells had been cited for contaminating nearby drinking water wells—in some cases with levels of methane high enough to be at risk for explosion. Researchers found that elevated methane levels in water wells near these fracking operations were accompanied by attendant spikes in iron and sulfates. These findings “document a way to distinguish newly migrated methane from pre-existing sources of gas.” They also showed that methane and ethane concentrations in local water wells increased after gas drilling compared with predrilling concentrations and that these levels remained elevated seven years after leaks were initially reported.<sup>248, 249</sup> “We’ve documented that recent methane migration can change water chemistry in a way that can mobilize metals, such as iron, and release other unwanted chemical compounds, such as hydrogen sulfide,” said Joshua Woda, a co-author of the study, in a press statement.<sup>250</sup>

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<sup>246</sup> Funk, S. P., Duffin, L., He, Y., McMullen, C., Sun, C., Utting, N., . . . Alessi, D. S. (2019). Assessment of impacts of diphenyl phosphate on groundwater and near-surface environments: Sorption and toxicity. *Journal of Contaminant Hydrology*, 221, 50-57. doi: 10.1016/j.jconhyd.2019.01.002

<sup>247</sup> Frantz, M. W., Wood, P. B., & Merovich, Jr., G. T. (2018). Demographic characteristic of an avian predator, Louisiana Waterthrush (*Parkesia motacilla*), in response to its aquatic prey in a Central Appalachian USA watershed impacted by shale gas development. *PLOS One*, 13(11), e0206077. doi: 10.1371/journal.pone.0206077

<sup>248</sup> Woda, J., Wen, T., Oakley, D., Yoxtheimer, D., Engelder, T., Castro, M. C., & Brantley, S. L. (2018). Detecting and explaining why aquifers occasionally become degraded near hydraulically fractured shale gas wells. *Proceedings of the National Academy of Sciences*, 115(49), 12349-12358. doi: 10.1073/pnas.1809013115

<sup>249</sup> Bourzec, K. (2018, November 21). Chemical clues found for methane leaks caused by fracking. *Chemical and Engineering News*. Retrieved from <https://cen.acs.org/environment/water/Chemical-clues-found-methane-leaks/96/i47>

<sup>250</sup> Carrol, M. (2018, November 19). Ground and stream water clues reveal shale drilling impacts [Press release]. Penn State News. Retrieved from <https://news.psu.edu/story/548378/2018/11/19/research/ground-and-stream-water-clues-reveal-shale-drilling-impacts>

- November 6, 2018 – As reported by the news outlet, *WyoFile*, contaminated drinking water in Pavillion, Wyoming was likely caused by gas leaking from faulty gas wells as well as by leaks from 40 unlined pits that, for many years, served as dumps for drilling wastewater. This was the conclusion of three researchers, including two former U.S. Environmental Protection Agency (EPA) scientists, who had been investigating the pollution of Pavillion’s groundwater, including drinking water wells for at least 30 homes. The scientists presented their findings to the community in advance of publishing a peer-reviewed scientific journal article. Statistical analyses show a correlation between what was disposed in the pits and contaminants appearing in nearby drinking water wells. One of the former EPA scientists told community members that the Wind River Formation drinking water aquifer will likely never be cleaned up. A preliminary report from the EPA in 2011 about groundwater contamination in Pavillion was never finalized.<sup>251</sup>
- October 21, 2018 – Fracking brine, among other factors, is contributing to “freshwater salinization syndrome,” according to a study that examined the increasing saltiness of North American inland waters. Freshwater salinization, in turn, alters the behavior of other chemicals in water, mobilizing diverse chemical mixtures that alter drinking water quality.<sup>252</sup>
- October 17, 2018 – An international team of researchers tested fracking wastewater from two different wells in the Fox River area of Alberta, Canada for presence of endocrine-disrupting compounds. Using laboratory assays, they found that organic extracts of the wastewater samples did indeed disrupt hormone signaling pathways in environmentally relevant concentrations, as might occur in an accidental spill, however the wastewater from the two different wells did so in two different ways. “The results suggest that the properties and origins of endocrine-disrupting compounds in [fracking wastewater] from Wells A and B are different, complicating our understanding of potential environmental effects of releases.”<sup>253</sup>
- September 4, 2018 – Chemicals from fracking wastewater dumped into the Allegheny River Watershed a decade ago are still accumulating in mussels that live there. Researchers working in Pennsylvania found elevated levels of strontium in the shells of freshwater mussels living downstream of a disposal facility that treated fracking wastewater and released it into streams between 2008 and 2011. (The practice was halted thereafter when heavy metals and radioactivity began rising in drinking water). Mussels living upstream of the treatment plant showed no such elevated levels. Strontium is an elemental metal and a contaminant of fracking waste. It is absorbed by living organisms in a similar manner to calcium. Because mussels excrete their shells in discreet layers that

<sup>251</sup> Thuermer, A. M. (2018, November 6). Pavillion water experts fault leaky gas wells, unlined pits. *WyoFile*. Retrieved from <https://www.wyofile.com/pavillion-water-experts-fault-leaky-gas-wells-unlined-pits/>

<sup>252</sup> Kaushal, S. S., Likens, G. E., Pace, M. L., Haq, S., Wood, K. L., Galella, J. G., . . . Jaworski, N. (2018). Novel “chemical cocktails” in inland waters are a consequence of the freshwater salinization syndrome. *Philosophical Transactions of the Royal Society B*, 374, 20188017. doi: 10.1098/rstb.2018.0017

<sup>253</sup> He, Y., Zhang, Y., Martin, J. W., Alessi, D. S., Giesy, J. P., & Goss, G. G. (2018). *In vitro* assessment of endocrine disrupting potential of organic fractions extracted from hydraulic fracturing flowback and produced water (HF-FPW). *Environment International*, 121, 824-831. doi: 10.1016/j.envint.2018.10.014

can be aged (like tree rings), researchers were able to show that shell layers created after 2011, when dumping of fracking waste into streams had ceased, did not show a sharp reduction in strontium, suggesting that downstream sediments may act as a reservoir for persistent contaminants years after dumping stops.<sup>254</sup> This is one of the first studies to show bioaccumulation of fracking contaminants in the bodies of living animals, which means that fracking contaminants are entering the food chain. The most endangered of all North American fauna, freshwater mussels are currently suffering a mass extinction event, as a likely result of degraded water quality.<sup>255</sup> Commenting on these findings in a press statement, lead author Nathaniel Warner said, “We know that Marcellus development has impacted sediments downstream for tens of kilometers. And it appears it still could be impacted for a long period of time. The short timeframe that we permitted the discharge of these wastes might leave a long legacy.”<sup>256</sup>

- August 29, 2018 – Using reports created by the oil and gas industry, a Colorado State University team evaluated fracking waste spills in Weld County, Colorado and found that while large-scale operations generated less fracking wastewater per unit of energy generated, the total volume of spilled waste increased as the size of the operation increased. “The results suggest that employing fewer, large-scale operators would help reduce the overall volume of [wastewater] generated but not the overall volume spilled.” This study also found that the probability of groundwater contamination from those spills was not correlated with either the spill area or with the volume spilled. Instead, the depth to groundwater was a more accurate predictor of the probability of contamination, with shallow water tables at highest risk.<sup>257</sup>
- August 17, 2018 – With 548 permitted wells as of 2017, Belmont County is the most intensely fracked county in the state of Ohio. A Yale University team collected drinking water samples from 66 households in Belmont County that were located at varying distances away from well pads and analyzed them for the presence of fracking-related chemical contaminants. They also interviewed residents about their health symptoms. The primary goal of this exploratory study was to determine whether residential proximity to fracked wells was related to detection and concentrations of health-relevant drinking water contaminants. A second objective was to evaluate possible relationships between proximity to wells and health complaints in the community. The team found that all homes had at least one volatile organic compound or other organic compound above detectable levels and that prevalence of contaminants in drinking water, including

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<sup>254</sup> Geeza, T. J., Killikin, D. P., McDevitt, B., Van Sice, K., & Warner, N. R. (2018). Accumulation of Marcellus Formation oil and gas wastewater metals in freshwater mussel shells. *Environmental Science & Technology*, 52(18), 10883-10892. doi: 10.1021/acs.est.8b02727

<sup>255</sup> Marusic, K. (2018, September 5). Fracking chemicals dumped in the Allegheny River a decade ago are still showing up in mussels: study. *Environmental Health News*. Retrieved from <https://www.ehn.org/chemicals-from-fracking-in-pennsylvania-polluting-freshwater-mussels-2602333500.html>

<sup>256</sup> Matthews, J. (2018, October 22). Fracking wastewater accumulation found in freshwater mussels’ shells. [Press release.] *Penn State News*. Retrieved from <https://news.psu.edu/story/543054/2018/10/22/research/fracking-wastewater-accumulation-found-freshwater-mussels-shells>

<sup>257</sup> Shores, A., & Laituri, M. (2018) The state of produced water generation and risk for groundwater contamination in Weld County, Colorado. *Environmental Science and Pollution Research*, 25, 30390-30400. doi: 10.1007/s11356-018-2810-8



toluene, bromoform, and dichlorobromomethane, was higher in homes closer to the wells. Further, people who lived closer to multiple wells were more likely to report health problems including wheezing, stress, fatigue, and headache. This is the first study to concurrently collect drinking water samples, health information, and data on proximity to drilling and fracking operations.<sup>258</sup>

- August 15, 2018 – Using well information from the U.S. Energy Information Agency as well as state-based agencies, a Duke University team examined changes in water use intensity in U.S. drilling and fracking operations as horizontal drilling has evolved toward ever-long lateral wellbores. They found that water use for fracking operations increased by 770 percent per well between 2011 and 2016 across all U.S. shale basins. At the same time, the volume of fracking wastewater generated during the first year of extraction increased by up to 1,440 percent. “The steady increase of the water footprint of hydraulic fracturing with time implies that future unconventional oil and gas operations will require larger volumes of water for hydraulic fracturing, which will result in larger produced oil and gas wastewater volumes.” Noting that the freshwater used for hydraulic fracturing is either retained within the shale formation or returns as highly saline flowback waste that is often subsequently disposed of via deep well injection, the authors concluded that “the permanent loss of water use for hydraulic fracturing from the hydrosphere could outweigh its relatively lower water intensity” compared to other industrial uses of water, such as agriculture, where water is not lost to the hydrological cycle.<sup>259</sup>
- August 5, 2018 – Using water collected from streams and a reservoir near Middletown, Pennsylvania, a research team investigated how contamination with fracking chemicals, as during a spill event, alters the formation of disinfection byproducts when surface water is chlorinated for use as drinking water. They found a shift toward the creation of more brominated compounds. This finding has significant concerns for public health because brominated chemicals are not easily removed during the water treatment process and because discharge of bromide to surface waters remains largely unregulated.<sup>260</sup>
- July 19, 2018 – By simulating spills and discharge of fracking wastewater into rivers and streams, a Pennsylvania research team investigated the effects of fracking wastewater salinity on the creation of disinfection byproducts during drinking water treatment. They found evidence that the ions in salty fracking waste enhance the creation of these deleterious chemicals in ways that conventional water treatment processes cannot easily remove. “Further studies should focus on salinity removal technologies such as reverse osmosis, nanofiltration, electrodialysis, ion exchange, and lime/soda ash softening.”<sup>261</sup>

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<sup>258</sup> Elliott, E. G., Ma, X., Leaderer, B. P., McKay, L. A., Pedersen, C. J., Wang, C., ... & Deziel N. C. (2018). A community-based evaluation of proximity to unconventional oil and gas wells, drinking water contaminants, and health symptoms in Ohio. *Environmental Research*, 167, 550-557. doi: 10.1016/j.envres.2018.08.022

<sup>259</sup> Kondash, A. J., Lauer, N. E., & Vengosh, A. (2018). The intensification of the water footprint of hydraulic fracturing. *Science Advances*, 4(8), eaar5982. doi: 10.1126/sciadv.aar5982

<sup>260</sup> Huang, K. Z., Yuefeng, F. X., & Tang, H. L. (2018). Formation of disinfection by-products under influence of shale gas produced water. *Science of the Total Environment*, 647, 744-751. doi: 10.1016/j.scitotenv.2018.08.055

<sup>261</sup> Huang, K. Z., Tang, H. L., & Yuefeng, F. Z. (2018). Impacts of shale gas production wastewater on disinfection byproduct formation: An investigation from a non-bromide perspective. *Water Research*, 144, 656-664. doi: 10.1016/j.watres.2018.07.048

- July 13, 2018 – Chemicals associated with fracking operations have been known to contaminate surface and ground water, and many of them have been identified as endocrine disruptors in mammals, raising questions about possible perturbations of other biological processes, such as immunity. Using tadpoles, an international team investigated how chemicals found in fracking wastewater might affect the developing immune system in amphibians. They found evidence for concern. Even at doses below those found in groundwater near spill sites, many exposed tadpoles died. “A first finding of this study is the startling toxicity of the [fracking chemical] mixture to tadpoles...it seems likely that the lethal effect results from the combined activity of some or all of these chemicals.” Lower doses significantly altered genes associated with immune functioning and made the developing frogs less able to fight off viral infections. “These findings suggest that [fracking-associated] water pollutants at low but environmentally relevant doses have the potential to induce acute alterations of immune function and antiviral immunity.”<sup>262</sup>
- July 4, 2018 – Wastewater samples from a newly fracked oil well in Colorado were examined over 220 days using assays to assess changing toxicity levels. The results revealed significant toxicity throughout well production and during the first 55 days of flowback, with peak toxicity occurring on the first day of flowback. Researchers also looked at the community of microbes (bacteria and archaea) living in the wastewater. Some of these organisms originated from deep in the shale formation and others from the source water used for fracking. These species rapidly changed in relative abundance to one another as the toxicity of the wastewater evolved over time. “Late stage produced water communities gradually became similar to those in the earliest sample of flowback water, indicating that early conditions have a great impact on the resident microbiota over the life of the well.”<sup>263</sup>
- June 21, 2018 – A Duke University-led lab study used mouse tissue cultures to investigate possible impacts of fracking wastewater exposure on the development of fat cells. They found that exposure to mixtures of 23 fracking chemicals, as well as raw stream water believed to be contaminated with fracking waste, promoted the growth of fat cells—even at very low concentrations. Collectively, these results show that fracking wastewater has the potential to impair metabolic health at levels found in the environment.<sup>264</sup> In a statement to the media, co-author Chris Kassotis said, “We saw significant fat cell proliferation and lipid accumulation, even when wastewater samples

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<sup>262</sup> Robert, J., McGuire, C. C., Kim, F., Nagel, S. C., Price, S. J., Lawrence, B. P., & De Jesus Andino, F. (2018). Water contaminants associated with unconventional oil and gas extraction cause immunotoxicity to amphibian tadpoles. *Toxicological Sciences*, 166(1), 39050. doi: 10.1093/toxsci/kfy179

<sup>263</sup> Hull, N. M., Rosenblum, J. S., Robertson, C. E., Harris, J. K., & Linden, K. G. (2018). Succession of toxicity and microbiota in hydraulic fracturing flowback and produced water in the Denver-Julesburg Basin. *Science of the Total Environment*, 644, 183-192. doi: 10.1016/j.scitotenv.2018.06.067

<sup>264</sup> Kassotis, C. D., Nagel, S. C., & Stapleton, H. M. (2018). Unconventional oil and gas chemicals and wastewater-impacted water samples promote adipogenesis via PPAR $\gamma$ -dependent and independent mechanisms in 3T3-L1 cells. *Science of the Total Environment*, 640-641, 1601-1610. doi: 10.1016/j.scitotenv.2018.05.030

were diluted 1,000-fold from their raw state and when wastewater-affected surface water samples were diluted 25-fold.”<sup>265</sup>

- April 28, 2018 – A Canadian study found that the water flea (*Daphnia magna*) becomes immobilized when the surface of test waters are contaminated with fracking waste. This effect was persistent and occurred at concentrations significantly lower than is required to kill this common zooplankton outright. Immobilized *Daphnia* did not recover after 48 hours, could not feed, and became unable to shed their carapace, thus impeding reproduction. The evidence suggests that surfactants in fracking fluid together with floating hydrocarbons work together to reduce surface tension in ways that disallow *Daphnia* from re-entering the water column. “The current study shows that an important component of the toxicity of [fracking wastewater] to *Daphnia magna* is physical impairment. Depending on how the endpoint of a toxicity test is defined, this mode of action may not be accounted for in laboratory assessments used to determine risk. However, physical toxicity effects are likely to be important in environmental settings where [fracking wastewater] spills may occur.”<sup>266</sup> (See also entry for March 5, 2019.)
- April 11, 2018 – A Drexel University team undertook a risk assessment of residential exposures to drinking water contaminated by fracking wastewater (flowback water). This simulation study found that within just eight hours—a realistic timeline for continual exposure due to a spill event—radioactive substances in the wastewater could produce demonstrable risks to human health, especially through the inhalation route. These radioactive compounds posed a greater threat to human health than other contaminants examined in this assessment, including arsenic, benzene, and vinyl chloride. “Radionuclides, which are known to exist in [fracking wastewater] as a result of occurring naturally within shale formations, pose a significant risk to human health and increase the likelihood of developing cancer in exposed individuals...median values for inhalation risk are at unacceptable levels. These exposures are due to the radionuclides aerosolizing from water primarily during showering.... Exposure to certain compounds of flowback water for only a few hours or days...can still present adverse effects.”<sup>267</sup>
- April 9, 2018 – An analysis of the bacterial community in 31 northwestern Pennsylvania trout streams showed that fracking activity altered the composition of species found in the sediment. Confirming the findings of previous studies, streams near drilling and fracking activity had significantly higher numbers of methane-metabolizing and methane-producing microorganisms, which are tolerant to acidic conditions. “Altogether, this study highlighted stable bacterial taxa responding to Marcellus shale activity and further

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<sup>265</sup> Lucas, T. (2018, June 21). Exposure to fracking chemicals and wastewater spurs fat cells. [Press release.] *Duke University Nicholas School for the Environment News*. Retrieved from <https://nicholas.duke.edu/about/news/exposure-fracking-chemicals-and-wastewater-spurs-fat-cells>

<sup>266</sup> Blewett, T. A., Delompré, P. L. M., Glover, C. N., & Goss, G. G. (2018). Physical immobility as a sensitive indicator of hydraulic fracturing fluid toxicity toward *Daphnia magna*. *Science of the Total Environment*, 635, 639-43. doi: 10.1016/j.scitotenv.2018.04.165

<sup>267</sup> Abualfaraj, N., Gurian P. L., & Olson, M. S. (2018). Assessing residential exposure risk from spills of flowback water from Marcellus Shale hydraulic fracturing activity. *International Journal of Environmental Research and Public Health*, 15, 727. doi: 10.3390/ijerph15040727

supplements a longitudinal correlation of increased acidity of stream water and fracking activity adjacent to headwater streams over five years.”<sup>268</sup>

- April 8, 2018 – Working in the South Fork Little Red River watershed in northern Arkansas, a research team found that populations of invertebrate animals were reduced downstream of drilling and fracking operations relative to upstream.<sup>269</sup>
- April 6, 2018 – Chemical characterization and toxicological testing of wastewater from fracked and conventionally drilled oil and gas wells in Pennsylvania were compared. Wastewater from both types of wells was equally toxic to animal and human cells growing in culture and was corrosive at high concentrations. This toxicity was not attributable to the presence of salts alone. Hydrocarbon chemicals were found in both well types and are known to be toxic to multiple human organs. “In vitro assays showed that normal cell survival, behavior, and morphology were severely impaired by short-term exposure to either type of sample at up to 1000-fold dilutions. ... Taken together, these results suggest that exposure to leaks or spills associated with either conventional or unconventional oil and gas extraction could potentially impact human health.”<sup>270</sup>
- April 5, 2018 – Led by researchers from the University of Missouri, a study conducted in Pavillion, Wyoming compared the effects of water pollution linked to fracking to effects from conventional drilling. Endocrine-disrupting chemicals were found in 22 groundwater samples taken near both kinds of wells. However, the results showed that contaminated groundwater collected near fracking sites was more disruptive to hormonal signaling in human cells than contaminated groundwater collected from conventional well pads. These results corroborate those of past studies.<sup>271</sup> In an associated news story in *WyoFile*, Christopher Kassotis, one of the co-authors of the new study, said, “We have now reported similar endocrine bioactivities across numerous unconventional oil/gas sampling regions, and other researchers are beginning to demonstrate similar effects in cell and animal models. These, above all else, lend strong support for our findings.”<sup>272</sup>
- March 5, 2018 – An exemption in the Safe Drinking Water Act allows hydraulic fracturing operations to escape federal regulation, leaving it up to individual states to determine how groundwater resources used for drinking are protected during fracking

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<sup>268</sup> Ulrich, N., Kirchner, V., Drucker, R., Wright, J. R., McLimans, J., Hazen, T. C., . . . Lamendella, R. (2018). Response of aquatic bacterial communities to hydraulic fracturing in northwestern Pennsylvania: A five-year study. *Scientific Reports*, 8(1), 5683. doi: 10.1038/s41598-018-23679-7

<sup>269</sup> Austin, B. J., Kelso, J. E., Evans-White, M. A., Entrekin, S. A., & Haggard, B. E. (2018). Can high volume hydraulic fracturing effects be detected in large watersheds? A case study of the South Fork Little Red River. *Current Opinion in Environmental Science & Health*, 3, 40-46. doi: 10.1016/j.coesh.2018.04003

<sup>270</sup> Crosby, L.M., Tatu, C. A., Varonka, M., Charles, K. M., & Orem, W. H. (2018). Toxicological and chemical studies of wastewater from hydraulic fracture and conventional shale gas wells. *Environmental Toxicology*, 37(8), 2098-2111. doi: 10.1002/etc.4146

<sup>271</sup> Kassotis, C. D., Vu, D. C., Vo, P. H., Lin, C.-H., Cornelius-Green, J. N., Patton, S., & Nagel, S. C. (2018). Endocrine-disrupting activities and organic contaminants associated with oil and gas operations in Wyoming groundwater. *Archives of Environmental Contamination and Toxicology*, 72(2), 247-258. doi: 10.1007/s00244-018-0521-2

<sup>272</sup> Thuermer, Jr., A. M. (2018, April 27). Study: Water near fracked Wyo gas field disrupts hormones. *WyoFile*. Retrieved from <https://www.wyofile.com/study-water-near-fracked-wyo-gas-field-disrupts-hormones/>

operations that take place on lands without federal or tribal mineral rights. A research team from Stanford University, University of California, Berkeley, and Lawrence Berkeley National Laboratory assessed these state-based oil and gas regulations in 17 different states. They found that the definitions of “protected groundwater” are vague, inconsistent and, very often, offer less protection than federal regulations. For example, in Alabama and New Mexico, protection of drinking water appears discretionary. In Colorado and Texas, protection of drinking water depends on the location of the oil and gas fields. In Illinois, protection during fracking only applies to horizontal wells. In California, drinking water must be monitored but not explicitly protected. Concluding from these findings that the nation’s drinking water resources are vulnerable to contamination from oil and gas extraction and wastewater disposal, the research team recommended that criteria defined by the EPA for an underground drinking water source be consistently used to define protected groundwater in state-based oil and gas regulations.<sup>273</sup>

- February 15, 2018 – A UK team used reports from the Texas Railroad Commission (1999-2015) and the Colorado Oil and Gas Conservation Commission (2009-2015) to examine spill rates from oil and gas well pads. They found that the spill rate in both Colorado and Texas significantly increased over the recorded time period, with equipment failure cited as the most common cause. In Colorado, 33 percent of the spills were discovered during site remediation and random site inspections. Using these data, the team predicted that a UK fracking industry would likely experience a spill for every 19 well pads developed.<sup>274</sup>
- January 31, 2018 – Researchers in Arkansas found that water withdrawals for fracking operations can dangerously deplete water levels in up to 51 percent of streams in ways that potentially threaten drinking water supplies, damage aquatic life, and disrupt recreation. “There is potential for these withdrawals to cause water stress,” the paper concluded.<sup>275</sup> Water stress represents risk of water scarcity for people caused by increases in economic costs or altered stream flow that results in loss of aquatic biodiversity and ecosystem functioning.
- January 27, 2018 – Fracking wastewater is a developmental toxicant to zebra fish embryos, according to results of a laboratory study conducted by a Canadian team of researchers. Exposure to various concentrations of fracking flowback and produced

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<sup>273</sup> DiGiulio, D. C., Shonkoff, S. B. C., & Jackson, R. B. (2018). The need to protect fresh and brackish groundwater resources during unconventional oil and gas development. *Current Opinion in Environmental Science and Health*, 3, 1-7. doi: 10.1016/j.coesh.2018.01.002

<sup>274</sup> Clancy, S. A., Worrall, F., Davies, R. J., & Gluyas, J. G. (2018). The potential for spill and leaks of contaminated liquids from shale gas developments. *Science of the Total Environment*, 626, 1463-1473. doi: 10.1016/j.scitotenv.2018.01.177

<sup>275</sup> Entrekin, S., Trainor, A., Saiers, J., Patterson, L., Maloney, K., Fargione, J., . . . Ryan, J. N. (2018). Water stress from high-volume hydraulic fracturing potentially threatens aquatic biodiversity and ecosystem services in Arkansas, United States. *Environmental Science & Technology*, 52(4), 2349-2358. doi: 10.1021/acs.est.7b03304

water, collected from well sites in Alberta, was linked to spinal and heart abnormalities and patterns of altered gene expression consistent with endocrine disruption.<sup>276</sup>

- January 23, 2018 – An Ohio State University team developed and used numerical models to simulate how methane from a leaking well could migrate into different types of drinking water aquifers. Their results showed that rapid, long-distance gas flow was most likely to occur when a pulse of gas under high pressure from a faulty gas well entered into a fractured rock aquifer. In these cases, methane can easily migrate a distance of 1 kilometer within a week and in many different directions, including laterally away from the natural gas well. Current efforts to evaluate natural gas leakage from faulty wells “likely underestimate contributions from small-volume, low-pressure leakage events,” which require extended periods of environmental monitoring.<sup>277</sup>
- January 16, 2018 – An editorial in the journal *Groundwater* warned researchers against being too quick to dismiss the presence of methane in groundwater near fracking sites as “always naturally occurring,” especially in places where no pre-drill baseline data are available or in studies where average methane levels are being compared. Noting that the geological conditions that facilitate the natural migration of hydrocarbons are often “muddled, obfuscating the presence of hydrocarbon pollution due to gas leaking from production wells,” the editorial encouraged study designs that make use of odds-ratio tests and geochemical tracers. Fractured rocks within shallow aquifers, in particular, are concerning “both in terms of their potential for facilitating rapid ... gas flow, and their inherent geometric complexity, which impact hydrocarbon gas transport mechanisms.”<sup>278</sup>
- January 16, 2018 – The Pennsylvania Department of Environmental Protection determined that fracking wastewater that had leaked from a storage pit contaminated groundwater and rendered a natural spring used for drinking water in Greene County undrinkable.<sup>279</sup>
- January 9, 2018 – A University of Texas team collected groundwater samples from across shale basins in Texas and reported on the discovery of opportunistic, pathogenic bacteria in fracking-impacted water wells in Texas. These results raise questions about fracking’s effects on the microbial ecology of aquifers. Commenting on their findings, the researchers noted, “The results were quite surprising. Not only did we find that various opportunistic pathogens could survive in the presence of hydrocarbon gases and chemical additives, they appeared to thrive and exhibited robust resistance profiles to

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<sup>276</sup> He, Y., Sun, C., Zhang, Y., Folkerts, E. J., Martine, J. W., & Goss, G. G. (2018). Developmental toxicity of the organic fraction from hydraulic fracturing flowback and produced water to early life stages of zebrafish (*Danio rerio*). *Environmental Science & Technology*, 52, 3820-3830. doi: 10.1021/acs.est.7b06557

<sup>277</sup> Moortgat, J., Schwartz, F. W., & Darrah, T. H. Numerical modeling of methane leakage from a faulty natural gas well into fractured tight formations. *Groundwater*, 56(2), 163-175. doi: 10.1111/gwat.12630

<sup>278</sup> Darrah, T. H. (2018). Time to settle the fracking controversy. *Groundwater*, 65(2). doi: 10.1111/gwat.12636

<sup>279</sup> Niedbala, B. (2018, January 16). W. Va. company fined \$1.7 million for violations at 14 well sites in Greene County. *Observer-Reporter*. Retrieved from [https://observer-reporter.com/news/localnews/w-va-company-fined-million-for-violations-at-well-sites/article\\_cc1ce344-faec-11e7-84ca-076df3832f29.html](https://observer-reporter.com/news/localnews/w-va-company-fined-million-for-violations-at-well-sites/article_cc1ce344-faec-11e7-84ca-076df3832f29.html)

multiple antibiotics. We even observed that certain pathogens were resilient to high levels of chlorination.”<sup>280</sup>

- December 11, 2017 – A report by the *Texas Observer* investigated groundwater depletion by fracking operations in west Texas at the southern edge of the Ogallala Aquifer. Groundwater conservation districts lack legal financial resources to restrict groundwater pumping or even compel metering on water wells that would monitor exactly how much water is pumped. In Howard County alone, water used for fracking is now believed to constitute about 20 percent of average annual water use.<sup>281</sup>
- November 16, 2017 – The 2005 Energy Policy Act prohibited the EPA from regulating fracking under the Safe Drinking Water Act and from requiring that operators disclose their chemicals. According to an investigation by *InsideClimate News*, the scientific study that justified this provision (which is widely known as the Halliburton loophole) was the subject of a whistleblower complaint. The study was also disavowed by its authors, who said the conclusion of the report—that fracking posed no risk to groundwater—was not supported by the evidence. These authors removed their names from the final document. Interviewed for the story, one of these authors said that the belief that fracking was safe for water was a foregone conclusion at the EPA under George W. Bush. “What we would have said in the conclusion is that there is some form of risk from hydraulic fracturing to groundwater. How you quantify it would require further analyses, but, in general, there is some risk.”<sup>282</sup>
- November 9, 2017 – As part of a preliminary study, a Texas team assessed the groundwater microbiome in a rural area of southern Texas where farming and fracking co-exist. Each of the sampled water wells had a unique community of microorganisms living in the water. The dominant bacteria were denitrifying species that transform nitrates into gaseous nitrogen or those that break apart hydrocarbon molecules. Earlier studies have postulated that fracking can alter the chemical composition of groundwater and change the species composition of the microbial communities living within it. The results of this study “do not provide a definitive link between [fracking] or agricultural activities and the groundwater microbiome; however, they do provide a baseline measurement of bacterial diversity and quantity in groundwater located near these anthropogenic activities.”<sup>283</sup>

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<sup>280</sup> Hildenbrand, Z. L., Santos, I., & Schug, K. (2018, January 9). Detecting harmful pathogens in water: Characterizing the link between fracking and water safety. *Science Trends*. Retrieved from <https://sciencetrends.com/detecting-harmful-pathogens-water-characterizing-link-fracking-water-safety/>

<sup>281</sup> Collins, C. (11 December, 2017). Big spring vs. big oil. *Texas Observer*. Retrieved from <https://www.texasobserver.org/big-spring-vs-big-oil/>

<sup>282</sup> Banerjee, N. (16 November, 2017). Industrial strength: How the U.S. government hid fracking's risks to drinking water. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/16112017/fracking-chemicals-safety-epa-health-risks-water-bush-cheney>

<sup>283</sup> Santos, I. C., Martin, M. S., Reyes, M. L., Carlton Jr., D. D., Stigler-Granados, P., Valerio, M. A., ... & Schug, K. A. (2017). Exploring the links between groundwater quality and bacterial communities near oil and gas extraction activities. *Science of the Total Environment*. 618, 165-173. doi: 10.1016/j.scitotenv.2017.10.264

- November 1, 2017 – In Oklahoma, horizontal wells can be fracked within 600 feet of older, vertical wells that do not use fracking. Oil companies in Oklahoma that extract oil using conventional, vertical wells alleged that hundreds of their wells have been inundated by fluids from nearby horizontal wells that use high-volume hydraulic fracturing, as documented by *E&E News*. Vertical well operators have raised questions about whether these “frack hits” from nearby horizontal wells that have flooded their own wells have also reached the groundwater. “Logic said it will impact [groundwater],” said one driller. “There was water coming up out of the ground. There was enough pressure to bring it to the surface.” Small operators of vertical wells, organized as the Oklahoma Energy Producers Alliance (OEPA), released a study estimating that, in just one county alone, there were 400 cases of frack fluid from horizontal wells flooding nearby vertical wells.<sup>284, 285</sup>
- October 31, 2017 – A study of fracking wastewater disposed of in rivers and streams found that chemical contaminants in the waste were transformed into more toxic substances when they chemically reacted with chlorinated compounds discharged from downstream drinking water treatment plants. The result was dozens of different, brominated and iodinated disinfection byproducts (DBPs). A lab analysis found that all were highly toxic to mammalian cells. Conventional water treatment practices do not remove these chemicals. “It is likely that in oil- and gas-impacted drinking water sources, iodo-phenolic DBPs could form at significant levels, particularly in cases in which chloramination is used.”<sup>286</sup>
- October 18, 2017 – Researchers concerned about reports of skin rashes, gastrointestinal distress, and breathing problems among people who live near drilling and fracking operations found increased levels of certain harmful bacteria in private water wells impacted by fracking in the Barnett and Eagle Ford Shale areas in Texas. These results raise questions about whether drilling and fracking activities could alter the communities of microorganisms in groundwater in ways that pose health risks. According to one of the lead authors of the study, interviewed in the *Dallas News*, “the potential contribution of these microbes to these health effects is probably understudied, underappreciated, unknown.”<sup>287, 288</sup>

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<sup>284</sup> Soraghan, M. (1 November, 2017). Now it’s oilmen who say fracking could harm groundwater. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060065209>

<sup>285</sup> OEPA. (2017, September 14). Are vertical wells impacted by horizontal drilling? A study of Kingfisher County. *E&E News*. Retrieved from [https://www.eenews.net/assets/2017/10/27/document\\_pm\\_07.pdf](https://www.eenews.net/assets/2017/10/27/document_pm_07.pdf)

<sup>286</sup> Liberatore, H. K., Plewa, M. J., Wagner, E. D., VanBriesen, J. M., Burnett, D. B., Cizmas, L. H., & Richardson, S. D. (2017). Identification and comparative mammalian cell cytotoxicity of new iodo-phenolic disinfection byproducts in chloraminated oil and gas wastewaters. *Environmental Science & Technology Letters*, 4(11), 475–480. doi: 10.1021/acs.estlett.7b00468

<sup>287</sup> Martin, M. S., Santos, I. C., Carlton Jr. D. D., Stigler-Granados, P., Hildenbrand, Z. L., & Schug, K. A. (2017). Characterization of bacterial diversity in contaminated groundwater using matrix-assisted laser desorption/ionization time-of-flight mass spectrometry. *Science of the Total Environment*. Advance online publication. doi: 10.1016/j.scitotenv.2017.10.027

<sup>288</sup> Mosier, J. (2017, December 1). UTA research finds dangerous bacteria in groundwater near Texas gas drilling sites. *Dallas News*. Retrieved from <https://www.dallasnews.com/business/energy/2017/12/01/uta-study-finds-dangerous-bacteria-groundwater-near-texas-gas-drilling-sites>



- August 3, 2017 – Due to permitting errors and a mix-up in records 30 years ago, wastewater from drilling operations in California was mistakenly injected directly into drinking water aquifers. Six years after the discovery of the problem, 175 wastewater wells that were illegally injecting into protected aquifers have been shut down, but hundreds more are still operating. An investigation by KQED Science revealed that California state water regulators know very little about the actual impact of those injections on the state’s drinking water reserves. “State water regulators say they hope to figure out what the larger impacts have been in years ahead, but have no set timeline. The risk is that they’ve allowed oil companies to contaminate drinking water aquifers to such an extent that Californians may have permanently lost those sources of fresh water.”<sup>289</sup> An earlier investigation by KQED Science revealed that illegal wastewater wells would still be allowed to operate while the necessary paperwork was filed.<sup>290</sup>
- July 12, 2017 – In western Pennsylvania, a team of researchers looked at sediments in the Conemaugh River watershed downstream of a treatment plant that was specially designed to treat fracking wastewater. The researchers found contamination for many miles downstream with fracking-related chemicals that included radium, barium, strontium, and chloride, as well as endocrine-disrupting and carcinogenic compounds. The peak concentrations were found in sediment layers that had been deposited during the years of peak fracking wastewater discharge. Elevated concentrations of radium were detected as far as 12 miles downstream of the treatment plant and were up to 200 times greater than background. Some stream sediment samples were so radioactive that they approached levels that would, in some U.S. states, classify them as radioactive waste and necessitate special disposal.<sup>291, 292</sup>
- May 31, 2017 – A U.S. Geological Survey (USGS) team sampled drinking water wells near drilling and fracking sites in the Eagle Ford, Fayetteville, and Haynesville Shale basins and found detectable levels of methane and benzene. However, the sources of these contaminants were unclear, and, given the slow travel time of groundwater, “decades or longer may be needed to fully assess the effects of potential subsurface and surface releases of hydrocarbons on the wells.”<sup>293</sup>

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<sup>289</sup> Sommer, L. (17 August, 2017). How much drinking water has California lost to oil industry waste? No one knows. *KQED Science*. Retrieved from <https://www2.kqed.org/science/2017/08/03/how-much-drinking-water-has-california-lost-to-oil-industry-waste-no-one-knows/>

<sup>290</sup> Sommer, L. (17 January, 2017). California says oil companies can keep dumping wastewater during state review. *KQED Science*. Retrieved from <https://www2.kqed.org/science/2017/01/17/california-says-oil-companies-can-keep-dumping-wastewater-during-state-review/>

<sup>291</sup> Burgos, W. D., Castillo-Meza, L., Tasker, T. L., Geeza, T. J., Drohan, P. J., Liu, X., ... Warner, N. R. (2017). Watershed-scale impacts from surface water disposal of oil and gas wastewater in Western Pennsylvania. *Environmental Science & Technology*, 51(15), 8851–8860. doi: 10.1021/acs.est.7b01696

<sup>292</sup> Johnston, I., (2017, July 12). Fracking can contaminate rivers and lakes with radioactive material, study finds. *The Independent*. Retrieved from <http://www.independent.co.uk/news/science/fracking-dangers-environment-water-damage-radiation-contamination-study-risks-a7837991.html>

<sup>293</sup> McMahon, P., Barlow, J. R. B., Engle, M. A., Belitz, K., Ging, P. B., Hunt, A. G., ... & Kresse, T. M. (2017). Methane and benzene in drinking-water wells overlying the Eagle Ford, Fayetteville, and Haynesville Shale hydrocarbon production areas. *Environmental Science & Technology*, 51(12), 6727-6734. doi: 10.1021/acs.est.7b00746

- May 1, 2017 – A study examining the impacts of drilling and fracking operations on public drinking water in Pennsylvania found evidence of contamination when drinking water source intakes were located within one kilometer (.62 miles) of a well pad. Noting that many Pennsylvanians living near well pads drink bottled water, the authors concluded, “our results suggest that these perceived risks may in fact be justified.”<sup>294</sup> (See also entry below for October 13, 2016.)
- April 19, 2017 – Using data from the South Coast Air Quality Monitoring District, a team of researchers in California compared chemicals used in fracking operations with those used in the routine maintenance of conventional oil and gas wells where chemicals are used to aid in drilling, for corrosion control, to clean the wellbore, and to enhance oil recovery. They found significant overlap in both the types and amounts of chemicals used. “The results of this study indicate regulations and risk assessments focused exclusively on chemicals used in well-stimulation activities may underestimate potential hazard or risk from overall field chemical-use. . . . Our analysis shows that hydraulic fracturing is just one of many applications of hazardous chemicals on oil and gas fields.”<sup>295</sup>
- April 5, 2017 – A three-year study in West Virginia led by scientists at Duke University assessed surface water and groundwater drawn from drinking water wells both before and after drilling and fracking began in the region. Using geochemical techniques, including a suite of tracers that help distinguish naturally occurring methane and salts from those contained in fracking fluid, the researchers found no evidence of groundwater contamination. They did, however, document threats to surface water from fracking wastewater spills.<sup>296</sup> In an accompanying statement, the researchers noted, “What we found in the study area in West Virginia after three years may be different from what we see after 10 years because the impact on groundwater isn’t necessarily immediate.”<sup>297</sup>
- Feb 21, 2017 – Between 2005 and 2014, researchers surveyed spill record data from drilling and fracking operations in four states (Colorado, New Mexico, North Dakota, and Pennsylvania). During these nine years, they documented 6,678 total spills, or about five spills each year for every 100 wells. Between 2 and 16 percent of wells reported a spill each year. Half of all spills were related to storage and transport of fluids through flow lines. The authors also found that the chances of spills are highest during the first three

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<sup>294</sup> Hill, E., & Ma, L. (2017). Shale gas development and drinking water quality. *American Economic Review: Papers & Proceedings*, 107(5), 522–525. doi: 10.1257/aer.p20171133

<sup>295</sup> Stringfellow, W. T., Camarillo, M. K., Domen, J. K., & Shonkoff, S. B. C. (2017) Comparison of chemical-use between hydraulic fracturing, acidizing, and routine oil and gas development. *PLoS ONE*, 12(4), e0175344. doi: 10.1371/journal.pone.0175344

<sup>296</sup> Harkness, J. S., Darrah, T. H., Warner, N. R., Whyte, C. J., Moore, M. T., Millot, R., . . . Vengosh, A. (2017). The geochemistry of naturally occurring methane and saline groundwater in an area of unconventional shale gas development. *Geochimica et Cosmochimica Acta*, 208, 302–334. doi: 10.1016/j.gca.2017.03.039

<sup>297</sup> Lucas, T. (2017, April 24). West Virginia groundwater not affected by fracking, but surface water is [Press release]. Retrieved from <https://nicholas.duke.edu/about/news/west-virginia-groundwater-not-affected-fracking-surface-water>

years of a well's life and that spill reporting requirements differ markedly from state to state, making impossible the task of comparing states or creating a national picture.<sup>298, 299</sup>

- January 31, 2017 – California is the only state that allows fracking waste to be held in unlined, open pits, creating risks for groundwater contamination. A California Water Boards investigation found that, as of January 2017, 1,000 such pits were operational, with 400 lacking required state permits. The vast majority is located in Kern County.<sup>300</sup>
- December 14, 2016 – To better understand the impact of fracking fluid spills on aquatic animals, scientists at the University of Alberta exposed rainbow trout in laboratory tanks to various dilutions of fracking fluids. Even at very low exposures, the fish experienced adverse effects, including alterations in liver functioning and disruption of hormonal pathways. [This study was partially funded by industry.]<sup>301</sup>
- December 13, 2016 – The final version of the EPA's six-year, \$29 million study on the impacts of hydraulic fracturing on the nation's drinking water confirmed that fracking activities have caused contamination of water resources in the United States, and it traced the various routes by which drinking water can be impacted by fracking. Documented cases of drinking water contamination have resulted from spills of fracking fluid and fracking wastewater; discharge of fracking waste into rivers and streams; and underground migration of fracking chemicals, including gas, into drinking water wells. Depletion of aquifers caused by water withdrawals has created other impacts.<sup>302, 303, 304, 305</sup> The final EPA report detailed the problem of fracking-related drinking water contamination in three communities—Pavillion, Wyoming; Dimock, Pennsylvania; and

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<sup>298</sup> Patterson, L., Konschnik, K., Wiseman, H., Fargione, J., Maloney, K. O., Kiesecker, J., ... Saiers, J. E. (2017). Unconventional oil and gas spills: Risks, mitigation priorities and states reporting requirements. *Environmental Science & Technology*, 51(5), 2563–2573. doi: 10.1021/acs.est.05749

<sup>299</sup> Kusnetz, N. (2017, February 21). Fracking well spills poorly reported in most top-producing states, study finds. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/21022017/fracking-spills-north-dakota-colorado>

<sup>300</sup> California Water Boards. (2017, January 31). *Produced water pond status report*. Retrieved from [https://www.waterboards.ca.gov/water\\_issues/programs/groundwater/sb4/docs/pond\\_rpt\\_0117\\_fnl.pdf](https://www.waterboards.ca.gov/water_issues/programs/groundwater/sb4/docs/pond_rpt_0117_fnl.pdf)

<sup>301</sup> He, Y., Folkerts, E. J., Zhang, Y., Martin, J. W., Alessi, D. S., & Goss, G. G. (2017). Effects on biotransformation, oxidative stress, and endocrine disruption in rainbow trout (*Oncorhynchus mykiss*) exposed to hydraulic fracturing flowback and produced water. *Environmental Science & Technology*, 51(2), 940-947. doi: 10.1021/acs.est.6b04695

<sup>302</sup> U.S. EPA. (2016). *Hydraulic fracturing for oil and gas: Impacts from the hydraulic fracturing water cycle on drinking water resources in the United States*. U.S. Environmental Protection Agency, Washington, DC, EPA-600-R-16-236Fa. Retrieved from <https://www.epa.gov/hfstudy>

<sup>303</sup> U.S. EPA. (2016). *Hydraulic fracturing for oil and gas: Impacts from the hydraulic fracturing water cycle on drinking water resources in the United States* (Appendices). U.S. Environmental Protection Agency, Washington, DC, EPA-600-R-16-236Fb. Retrieved from <https://www.epa.gov/hfstudy>

<sup>304</sup> U.S. EPA. (2016). *Hydraulic fracturing for oil and gas: Impacts from the hydraulic fracturing water cycle on drinking water resources in the United States* (Executive Summary). U.S. Environmental Protection Agency, Washington, DC, EPA-600-R-16-236ES. Retrieved from <https://www.epa.gov/hfstudy>

<sup>305</sup> Tong, S., & Scheck, T. (30 November, 2016). EPA's late changes to fracking study downplay risk of drinking water pollution. *Marketplace.org*. Retrieved from <https://www.marketplace.org/2016/11/29/world/epa-s-late-changes-fracking-study-portray-lower-pollution-risk>

Parker County, Texas.<sup>306</sup> Summing up the report, then-EPA Deputy Administrator Tom Burke said in a statement to *American Public Media*, “We found scientific evidence of impacts to drinking water resources at each stage of the hydraulic fracturing cycle.”<sup>307</sup> (See also the entry for June 5, 2015, which describes the contents of the 2015 draft report.)

- December 1, 2016 – According to a review paper that examines the potential environmental impacts of oil and gas wastewater, about 5 percent of fracking waste is accidentally or illegally spilled. Almost all of the rest is transported off site and injected into disposal wells that are drilled into porous geological formations. In North Dakota’s Bakken Shale, disposal wells are located within miles of the well pad, and the wastewater can travel there via pipeline. In Pennsylvania’s Marcellus Shale, drilling activity exceeds the capacity for disposal of waste in local wells and must be trucked out of state.<sup>308</sup>
- November 4, 2016 – A critical review of potential routes of water contamination from drilling and fracking operations in the Bakken Shale noted that the high salinity of fracking wastewater minimizes its recycling options and thus contributes to the need for disposal wells. Transportation of large volumes of waste to these wells, via truck or pipeline, presents opportunities for large spills that can threaten groundwater.<sup>309</sup>
- October 16, 2016 – A team of scientists led by researchers at the Lawrence Berkeley National Laboratory evaluated chemicals used for fracking in California oil fields. Chemical additives included a wide variety of solvents in large amounts, as well as other toxic substances, including biocides and corrosion inhibitors.<sup>310</sup>
- October 14, 2016 – One of the first studies to investigate the impacts of fracking on the ecology of streams found that fracking “has the potential to alter aquatic biodiversity and methyl mercury concentrations at the base of food webs.” The researchers sampled 27 remote streams in the Marcellus Shale basin of Pennsylvania where drilling and fracking is taking place. They showed that methyl mercury levels in stream sites where fracking occurs were driven upwards by higher acidity and lower numbers of macroinvertebrates. In streams with the highest numbers of fracking fluid spills, “fish diversity was nil,” and

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<sup>306</sup> U.S. Environmental Protection Agency Science Advisory Board. (2016, August 11). *SAB review of the EPA’s draft assessment of the potential impacts of hydraulic fracturing for oil and gas on drinking water resources*. EPA-SAB-16-005. Retrieved from [https://yosemite.epa.gov/sab/sabproduct.nsf/LookupWebReportsLastMonthBOARD/BB6910FEC10C01A18525800C00647104/\\$File/EPA-SAB-16-005+Unsigned.pdf](https://yosemite.epa.gov/sab/sabproduct.nsf/LookupWebReportsLastMonthBOARD/BB6910FEC10C01A18525800C00647104/$File/EPA-SAB-16-005+Unsigned.pdf)

<sup>307</sup> Scheck, T. & Tong, S. (2016, December 13). EPA reverses course, highlights fracking contamination of drinking water. *APM Reports*. Retrieved from <https://www.apmreports.org/story/2016/12/13/epa-fracking-contamination-drinking-water>

<sup>308</sup> Konkel, L. (2016). Salting the earth: The environmental impact of oil and gas wastewater spills. *Environmental Health Perspectives*, 124(12), A230-A235. doi: 10.1289/ehp.124-A230

<sup>309</sup> Shrestha, N., Chilkoor, G., Wilder, J., Gadhamshetty, V., & Stone, J. J. (2016). Potential water resource impacts of hydraulic fracturing from unconventional oil production in the Bakken shale. *Water Research*, 108, 1-24. doi: 10.1016/j.watres.2016.11.006

<sup>310</sup> Stringfellow, W. T., Camarillo, M. K., Domen, J. K., Sandelin, W. L., Varadharajan, C., Jordan, P. D., & ... Birkholzer, J. T. (2017). Identifying chemicals of concern in hydraulic fracturing fluids used for oil production *Environmental Pollution*, 220, Part A, 413-420. doi: 10.1016/j.envpol.2016.09.082

in some cases, there were no fish at all, including in streams previously classified as high-quality brook trout habitat. “Fracking and flowback fluids can contain various highly acidic agents, organic and inorganic compounds, and even Hg [mercury]. The flowback fluids can reach nearby streams through leaking wastewater hoses, impoundments, and lateral seepage and blowouts, as well as by backflow into the wellhead. Flowback water reaching streams can . . . decrease aquatic biodiversity. . . . Lowered stream pH increases Hg solubility, leading to increased bioaccumulation in food webs.”<sup>311</sup>

- October 13, 2016 – Researchers at Pennsylvania State University and Ohio State University combined GIS data on drilling and fracking activities in Pennsylvania and Ohio with household data on bottled water purchases. They found that yearly household purchases of bottled water increased as local drilling and fracking intensity increased. This “averting behavior” is a measure of perceived risk. In 2010, averting-behavior expenditures in the form of bottle water purchases by people living in Pennsylvania’s shale counties totaled \$19 million.<sup>312</sup> (A subsequent study suggests that those engaged in tapwater averting behaviors in Pennsylvania have evidence-based reasons to be concerned. See entry above, for May 1, 2017.)
- September 22, 2016 – Using the agency’s list of 1076 chemicals that have reported use as ingredients in hydraulic fracturing fluid, EPA scientists developed a framework to analyze and rank subsets of chemicals in order to better understand which fracking-related chemicals pose the greatest risk to drinking water. Their model collates multiple lines of evidence. For example, data on inherent toxicity are combined with data on occurrence and propensity for environmental transport. In the absence of local data on actual human exposures, this model can serve as a qualitative metric to “identify chemicals that may be more likely than others to impact drinking water resources.”<sup>313</sup>
- September 16, 2016 – A reconnaissance analysis of groundwater in the Eagle Ford Shale region in southern Texas found sporadic detections of multiple VOCs and dissolved gas, providing evidence that “groundwater quality is potentially being affected by neighboring [drilling and fracking] activity, or other anthropogenic activities, in an episodic fashion.” The authors called for a more extensive investigation of possible groundwater contamination in the Eagle Ford basin.<sup>314, 315</sup>

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<sup>311</sup> Grant, C. J., Lutz, A. K., Kulig, A. D., & Stanton, M. R. (2016). Fracked ecology: Response of aquatic trophic structure and mercury biomagnification dynamics in the Marcellus Shale Formation. *Ecotoxicology*, 25, 1739–1750. doi: 10.1007/s10646-016-1717-8

<sup>312</sup> Wrenn, D. H., Klaiber, H. A., & Jaenicke, E. C. (2016). Unconventional shale gas development, risk perceptions, and averting behavior: evidence from bottled water purchases. *Journal of the Association of Environmental and Resource Economists*, 3(4), 770–817. doi: 10.1086/688487

<sup>313</sup> Yost, E. E., Stanek, J., & Burgoon, L. D. (2016). A decision analysis framework for estimating the potential hazards for drinking water resources of chemicals used in hydraulic fracturing fluids. *Science of the Total Environment*, 574, 1544–1558. doi: 10.1016/j.scitotenv.2016.08.167

<sup>314</sup> Hildenbrand, Z. L., Carlton Jr., D. D., Meik, J. M., Taylor, J. T., Fontenot, B. E., Walton, J. L., . . . Schug, K. A. (2016). A reconnaissance analysis of groundwater quality in the Eagle Ford shale region reveals two distinct bromide/chloride populations. *Science of the Total Environment*, 575, 672–680. doi: 10.1016/j.scitotenv.2016.09.070

<sup>315</sup> Hildenbrand, Z. L., Carlton Jr., D. D., Meik, J. M., Taylor, J. T., Fontenot, B. E., Walton, J. L., . . . Schug, K. A. (2017). Corrigendum to “A reconnaissance analysis of groundwater quality in the Eagle Ford shale region reveals

- July 11, 2016 – An interdisciplinary team led by University of Colorado researchers found methane in 42 water wells in the intensely drilled Denver-Julesburg Basin where high volume, horizontal fracking operations began in 2010. By examining isotopes and gas molecular ratios, the researchers determined that the gas contaminating these wells was thermogenic in origin, rather than microbial, and therefore had migrated up into the groundwater from underlying oil- and gas-containing shale. The steady rate of well contamination over time—two cases per year from 2001 to 2014—suggests that well failures, rather than the process of hydraulic fracturing itself, was the mechanism that created migration pathways for the stray gas to reach drinking water sources. Of the 42 affected wells, 11 had already been identified by state regulators as suffering from “barrier failures.”<sup>316</sup> Duke University geochemist Avner Vengosh, who was not an author of the paper, commented on the study in an accompanying article in *InsideClimate News*: “The bottom line here is that industry has denied any stray gas contamination: that whenever we have methane in a well, it is always preexisting. The merit of this is that it’s a different oil and gas basin, a different approach, and it’s saying that stray gas could happen.” In this same article, *InsideClimate News* reported that national standards for well construction do not exist, nor are there laws governing the type of cement that is used to seal the wellbore and prevent leaks.<sup>317</sup>
- May 24, 2016 – ATSDR conducted a public health evaluation using groundwater data gathered in 2012 by the EPA from 64 private drinking water wells in Dimock, Pennsylvania where natural gas drilling and fracking activities began in 2008 and where residents began reporting problems with their water shortly thereafter. The agency found that water samples collected from 27 Dimock wells contained contaminants “at levels high enough to affect human health.” These included methane, salts, organic chemicals, and arsenic. In 17 wells, levels of methane were high enough to create risk of fire or explosion.<sup>318</sup> Methane levels were not assessed in wells prior to the start of fracking activities in the area. Hence, the study is limited by lack of pre-drilling baseline data, and investigators did not attempt to determine the source of the contaminants. However, in its focus on identifying health impacts, ATSDR’s evaluation is a more comprehensive study than that conducted four years earlier by the EPA and calls into question its earlier, more reassuring conclusions.<sup>319, 320</sup>

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two distinct bromide/chloride populations.” *Science of the Total Environment*, 603–604, 834–835. doi: 10.1016/j.scitotenv.2017.05.200

<sup>316</sup> Sherwood, O. A., Rogers, J. D., Lackey, G., Burke, T. L., Osborn, S. G. & Ryan, J. N. (2016). Groundwater methane in relation to oil and gas development and shallow coal seams in the Denver-Julesburg Basin of Colorado. *Proceedings of the National Academy of Sciences* 113(30). doi: 10.1073/pnas.1523267113

<sup>317</sup> Banerjee, N. (2016, July 11). Colorado fracking study blames faulty wells for contamination. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/11072016/water-contamination-near-colorado-fracking-tied-well-failures>

<sup>318</sup> U.S. Agency for Toxic Substances and Disease Registry (2016, May 24). *Health Consultation: Dimock Groundwater Site*. Retrieved from

[http://www.atsdr.cdc.gov/hac/pha/DimockGroundwaterSite/Dimock\\_Groundwater\\_Site\\_HC\\_05-24-2016\\_508.pdf](http://www.atsdr.cdc.gov/hac/pha/DimockGroundwaterSite/Dimock_Groundwater_Site_HC_05-24-2016_508.pdf)

<sup>319</sup> Lustgarten, A. (2016, June 9). Federal report appears to undercut EPA assurances on water safety in Pennsylvania. *ProPublica*. Retrieved from <https://www.propublica.org/article/federal-report-appears-to-undercut-epa-assurances-water-safety-pennsylvania>

- May 9, 2016 – Sampling downstream of a fracking wastewater disposal facility in West Virginia, a USGS team documented changes in microbial communities and found evidence indicating the presence of fracking waste in water and sediment samples collected from Wolf Creek in West Virginia. Specifically, the researchers documented increased concentrations of barium, bromide, calcium, sodium, lithium, strontium, iron, and radium downstream of the disposal well.<sup>321</sup> In a *Washington Post* story about this study, lead author Denise Akob said that the key take-away message “is really that we’re demonstrating that facilities like this can have an environmental impact.”<sup>322</sup> (This study was done in collaboration with Susan Nagel’s team, which studied endocrine-disrupting activity in this same stream. See entry below for April 6, 2016.)
- April 30, 2016 – As part of an investigation based on aerial photographs taken by emergency responders during spring 2016 flooding, the *El Paso Times* documented plumes and sheens of chemicals from tipped-over storage tanks and inundated oil wells and fracking sites entering rivers and streams. “Many of the photos shot during Texas’ recent floods show swamped wastewater ponds at fracking sites, presumably allowing wastewater to escape into the environment—and potentially into drinking-water supplies.”<sup>323</sup>
- April 27, 2016 – Using geochemical and isotopic tracers to identify the unique chemical fingerprint of Bakken region brines, a Duke University study found that accidental spills of fracking wastewater have contaminated surface water and soils throughout North Dakota where more than 9,700 wells have been drilled in the past decade. Contaminants included salts as well as lead, selenium, and vanadium. In the polluted streams, levels of contaminants often exceeded federal drinking water guidelines. Soils at spill sites showed elevated levels of radium.<sup>324</sup> The study concluded that “inorganic contamination associated with brine spills in North Dakota is remarkably persistent, with elevated levels of contaminants observed in spill sites up to 4 years following the spill events.” In a comment about this study, lead author and Duke University geochemist Avner Vengosh said, “Until now, research in many regions of the nation has shown that contamination from fracking has been fairly sporadic and inconsistent. In North Dakota, however, we

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<sup>320</sup> U.S. Environmental Protection Agency. (2012, July 25). *EPA completes drinking water sampling in Dimock, Pa.* [Press release]. Retrieved from

<https://yosemite.epa.gov/opa/admpress.nsf/0/1A6E49D193E1007585257A46005B61AD>

<sup>321</sup> Akob, D. M., Mumford, A. C., Orem, W. H., Engle, M. A., Klinges, J. G., Kent, D. B., & Cozzarelli, I. M. (2016). Wastewater disposal from unconventional oil and gas development degrades stream quality at a West Virginia injection facility. *Environmental Science and Technology*, 50(11). doi: 10.1021/acs.est.6b00428

<sup>322</sup> Fears, D. (2016, May 11). This mystery was solved: scientists say chemicals from fracking wastewater can taint fresh water nearby. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/energy-environment/wp/2016/05/11/this-mystery-was-solved-scientists-say-chemicals-from-fracking-wastewater-can-taint-fresh-water-nearby/?utm\\_term=.c27045b60338](https://www.washingtonpost.com/news/energy-environment/wp/2016/05/11/this-mystery-was-solved-scientists-say-chemicals-from-fracking-wastewater-can-taint-fresh-water-nearby/?utm_term=.c27045b60338)

<sup>323</sup> Schladen, M. (2016, April 30). Flooding sweeps oil, chemicals into rivers. *El Paso Times*. Retrieved from <http://www.elpasotimes.com/story/news/2016/04/30/flooding-sweeps-oil-chemicals-into-rivers/83671348/>

<sup>324</sup> Lauer, N. E., Harkness, J. S., & Vengosh A. (2016). Brine spills associated with unconventional oil development in North Dakota. *Environmental Science & Technology*, 50(10). doi: 10.1021/acs.est.5b06349

find it is widespread and persistent, with clear evidence of direct water contamination from fracking.”<sup>325</sup>

- April 6, 2016 – A research team led by Susan Nagel at the University of Missouri traced a spike in endocrine-disrupting activity in a West Virginia stream, Wolf Creek, to an upstream facility that stores fracking wastewater. Levels detected downstream of the waste facility were above levels known to create adverse health effects and alter the development of fish, amphibians, and other aquatic organisms. Endocrine-disrupting compounds were not elevated in upstream sections of the creek.<sup>326, 327</sup> (See also entry for May 9, 2016 above.)
- March 29, 2016 – A study by Stanford University scientists determined that fracking and related oil and gas operations have indeed contaminated drinking water in the town of Pavillion, Wyoming where residents have long complained about foul-tasting water. The researchers found substances in the water that match those used in local fracking operations or found in nearby pits used for the disposal of drilling waste. Chemical contaminants included benzene, a known carcinogen, and toluene, a neurotoxicant. Possible mechanisms for contamination include defective cement well casings; spills and leaks from disposal pits; and underground migration of chemicals into aquifers from the fracked zone, which, in this area, is quite shallow. Also, in the Pavillion area, operators sometimes fracked directly into underground sources of water.<sup>328</sup> One of the authors of this study, Dominic DiGiulio, was also a lead scientist on the EPA’s earlier aborted investigation of Pavillion’s drinking water. (See entry for December 6, 2015 below.) In an interview about his new research, DiGiulio said that his findings raise concerns about similar water pollution in other heavily fracked regions. “Pavillion isn’t geologically unique in the West, and I’m concerned about the Rocky Mountain region of the U.S. The impact on [underground drinking water sources] could be fairly extensive. Pavillion is like a canary in a coal mine and we need to look at other fields.”<sup>329</sup> Co-author Rob Jackson noted, “There are no rules that would stop a company from doing this anywhere else.”<sup>330</sup>

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<sup>325</sup> Nicholas School of the Environment, Duke University. (2016, April 27). *Contamination in North Dakota linked to fracking spills* [Press release]. Retrieved from

<https://nicholas.duke.edu/about/news/ContaminationinNDLinkedtoFrackingSpills>

<sup>326</sup> Kassotis, C. D., Iwanowicz, L. R., Akob, D. M., Cozzarelli, I. M., Mumford, A. C., Orem, W. H., & Nagel, S. C. (2016). Endocrine disrupting activities of surface water associated with West Virginia oil and gas industry wastewater disposal site. *Science of the Total Environment*, 557-558. doi: 10.1016/j.sci.tenv.2016.03.113

<sup>327</sup> Bienkowski, B. (2016, April 6). In W. Virginia, frack wastewater may be messing with hormones. *Environmental Health News*. Retrieved from <http://www.environmentalhealthnews.org/ehs/news/2016/april/in-w.-virginia-frack-wastewater-may-be-messing-with-hormones>

<sup>328</sup> DiGiulio, D. C. & Jackson, R. B. (2016). Impact to underground sources of drinking water and domestic wells from production well stimulation and completion practices in the Pavillion, Wyoming, Field. *Environmental Science & Technology*, 50(8). doi: 10.1021/acs.est.5b04970

<sup>329</sup> Banerjee, N. (2016, March 29). Fracking study finds toxins in Wyoming town’s groundwater and raises broader concerns. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/29032016/fracking-study-pavillion-wyoming-drinking-water-contamination-epa>

<sup>330</sup> Jordan, R. (2016, March 29). Stanford researchers show fracking’s impact to drinking water sources. *Stanford News*. Retrieved from <http://news.stanford.edu/2016/03/29/pavillion-fracking-water-032916/>



- February 22, 2016 – Relying on voluntary disclosures reported to the FracFocus registry and a list compiled by the U.S. Congress, a German team surveyed the physiochemical properties of chemicals used in hydraulic fracturing fluid to evaluate their environmental fate and potential toxicity. Common ingredients included those known to contaminant groundwater, such as solvents, as well as those known to react strongly with other chemicals, such as biocides and strong oxidants, indicating that almost certainly, new chemical products are formed during the process of fracking and its aftermath. Hence, non-toxic additives could potentially react with other substances to create harmful byproducts. The authors conclude that a comprehensive assessment of risks would require an unabridged list of the chemical additives used for fracking, and they call for full disclosure.<sup>331, 332</sup>
- February 9, 2016 – An investigation of water contamination in the Barnett Shale by ABC-affiliate station WFAA in Dallas found numerous violations by operators who ignored regulations that require sealing vertical well pipes with a cement sheath to protect groundwater from stray gas and other vapors that might escape and migrate upwards into overlying aquifers. The WFAA report said that the Texas Railroad Commission, which oversees drilling and fracking operations in Texas, has failed to respond to alleged violations of a rule that requires cement seals around steel well casings in geological zones where drilling has penetrated layers of rock containing oil and gas deposits.<sup>333</sup>
- February 8, 2016 – An investigation by the *Columbus Dispatch* revealed that the amount of water that operators use for hydraulic fracturing in Ohio gas wells increased steadily from 2011 to 2015. The total amount of water increased, as did the volume of water used per well—from an average of 5.6 million gallons per well in 2011 to 7.6 million in 2014. The reason is that the horizontally drilled holes beneath each well have become longer, and these require more water during the fracking process.<sup>334</sup>
- February 2016 – In a lengthy account to Congress on the status of the underground waste injection well program that is overseen by the EPA, the U.S. Government Accountability Office (GAO) reported that the agency “has not consistently conducted oversight activities necessary to assess whether state and EPA-managed programs are protecting underground sources of drinking water” from contamination by fracking waste. Specifically, the GAO took the EPA to task for failure to require well-specific inspections, collect data on enforcement actions, review permitting requirements by state regulatory agencies, or analyze the resources the agency would need to do all the above to adequately oversee the Underground Injection Control program. The GAO noted that it

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<sup>331</sup> Elsner, M., & Hoelzer, K. (2016). Quantitative survey and structural classification of hydraulic fracturing chemicals reported in unconventional gas production. *Environmental Science & Technology*, 50(7). doi:10.1021/acs.est.5b02818

<sup>332</sup> Phys.Org. (9 March 2016). How to get a handle on potential risks posed by fracking fluids. Retrieved from <http://phys.org/news/2016-03-potential-posed-fracking-fluids.html>

<sup>333</sup> Shipp, B. (2016, February 9). Drilling records suggest lax state enforcement. WFAA, Dallas. Retrieved from <http://www.wfaa.com/mb/news/local/investigates/rules-ignored-water-fouled-in-barnett-shale/38337835>

<sup>334</sup> Arenschield, L. (2016, February 8). Drillers using more water to frack Ohio shale. *The Columbus Dispatch*. Retrieved from <http://www.dispatch.com/content/stories/local/2016/02/07/drillers-using-more-water-to-frack-ohio-shale.html>

had once before, in 2014, previously found the EPA negligent in its responsibilities to monitor drinking water sources for possible contamination with fracking waste.<sup>335</sup> (See entry below for September 23, 2014.)

- January 6, 2016 – Yale School of Public Health researchers analyzed more than 1,021 chemicals either used in fracking fluid or created during the process of hydraulic fracturing. They found that 781 of these chemicals lacked basic toxicity data. Of the 240 that remained, 157 were reproductive or developmental toxicants. These included arsenic, benzene, cadmium, formaldehyde, lead, and mercury.<sup>336</sup> Commenting on this study, lead author Nicole Deziel said, “This evaluation is a first step to prioritize the vast array of potential environmental contaminants from hydraulic fracturing for future exposure and health studies. Quantification of the potential exposure to these chemicals, such as by monitoring drinking water in people’s homes, is vital for understanding the public health impact of hydraulic fracturing.”<sup>337</sup>
- December 15, 2015 – A research team led by geologist Mukul Sharma from Dartmouth College discovered that chemical reactions between fracking fluid and rock can contribute to the toxicity of fracking wastewater. Specifically, the researchers found that fracking fluid can chemically react with the fractured shale in ways that cause barium, a toxic metal, to leach from clay minerals in the Marcellus Shale.<sup>338, 339</sup>
- December 6, 2015 – The *Caspar Star Tribune* investigated the EPA’s decision to transfer its study of possible fracking-related drinking water contamination in Pavillion, Wyoming to a state agency in 2013. Preliminary data from the EPA suggested that drilling and fracking operations had contaminated drinking water supplies. To date, the state study has found no definitive link between drilling and water contamination. Interviews with officials and documents obtained under the Freedom of Information Act revealed that the EPA had bowed to political pressure from state officials and industry representatives and that Wyoming regulators narrowed the scope of the study considerably and conducted little fieldwork.<sup>340</sup> (See also entry above for March 29, 2016.)

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<sup>335</sup> U.S. Government Accountability Office. (2016, February). *Drinking Water: EPA Needs to Collect Information and Consistently Conduct Activities to Protect Underground Sources of Drinking Water*. GAO-16-281. Retrieved from <http://gao.gov/assets/680/675439.pdf>

<sup>336</sup> Elliot, E. G., Ettinger, A. S., Leaderer, B. P., Bracken, M. B., & Deziel, N. (2016). A systematic evaluation of chemicals in hydraulic-fracturing fluids and wastewater for reproductive and developmental toxicity. Advance online publication. *Journal of Exposure Science & Environmental Epidemiology*. doi: 10.1038/jes.2015.81

<sup>337</sup> Greenwood, M. (2016, January 6). Toxins found in fracturing fluid and wastewater, study shows. *Yale News*. Retrieved from: <http://news.yale.edu/2016/01/06/toxins-found-fracking-fluids-and-wastewater-study-shows>

<sup>338</sup> Renock, D., Landis, J. D., & Sharma, M. (2016). Reductive weathering of black shale and release of barium during hydraulic fracturing. *Applied Geochemistry*, 65. doi: 10.1016/j.apgeochem.2015.11.001

<sup>339</sup> Dartmouth College. (15 December 2015). Fracking plays active role in generating toxic metal wastewater, study finds. *Science Daily*. Retrieved from <https://www.sciencedaily.com/releases/2015/12/151215134653.htm>

<sup>340</sup> Storrow, B. (2015, December 6). Pavillion today an EPA in retreat, a narrow state inquiry and no answers. *Caspar Star Tribune*. Retrieved from [http://trib.com/business/energy/pavillion-today-an-epa-in-retreat-a-narrow-state-inquiry/article\\_403f84de-830c-5558-9f3f-ea48fd48d7ca.html?utm\\_medium=social&utm\\_source=facebook&utm\\_campaign=user-share](http://trib.com/business/energy/pavillion-today-an-epa-in-retreat-a-narrow-state-inquiry/article_403f84de-830c-5558-9f3f-ea48fd48d7ca.html?utm_medium=social&utm_source=facebook&utm_campaign=user-share)

- November 19, 2015 – The Science Advisory Board (SAB) for the EPA reviewed the EPA’s June 2015 draft assessment of fracking’s impacts on drinking water, and challenged some of the summary statements that accompanied it, saying that they were over-generalized and not always aligned with the data in the report itself. Specifically, the SAB said, in a draft review, that the data cited by the report were too limited to support the headlined claim in the executive summary that drinking water impacts were neither “widespread” nor “systemic.” The SAB also critiqued the study for downplaying local impacts in its conclusions, noting that these impacts can sometimes be severe.<sup>341</sup>
- October 19, 2015 – A six-month investigation by *Penn Live* found long-standing “systemic failures” on the part of the Pennsylvania Department of Environmental Protection (PA DEP) to enforce regulations governing drilling and fracking operations. Lack of oversight and reliance on industry self-policing have been the hallmarks of Marcellus Shale development for the past ten years, in violation of Pennsylvanians’ constitutional right to clean air and water. Among the findings of this investigation: chronically leaking wastewater impoundments for which no fines or notices were issued to the operator; laboratory coding systems designed to obscure possible detections of certain chemical contaminants in residents’ drinking water; and lack of inspections at well sites.<sup>342</sup>
- October 13, 2015 – An international team of researchers found detectable levels of multiple organic chemical contaminants in private drinking water wells in northeastern Pennsylvania where fracking is practiced. One of the compounds was a known additive of fracking fluid. Chemical fingerprinting and noble gas isotopes were used to determine if the contaminants most likely originated from surface spills at the well site or via upward transport from the shale itself. The organic pollutants found in the water did not contain chemical markers—certain elements and salts—that would indicate migration from deep geological strata. The authors concluded that “the data support a transport mechanism...to groundwater via accidental release of fracturing fluid chemicals derived from the surface rather than subsurface flow of these fluids from the underlying shale formation.”<sup>343, 344</sup>
- September 23, 2015 – A team of researchers, examining how natural gas drilling and fracking operations across the nation affect creeks, streams and rivers, developed a predictive model and vulnerability index for surface water. They found that “all shale plays, regardless of location, had a suite of catchments that spanned highly degraded to

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<sup>341</sup> Banerjee, N. (2015, November 19). EPA finding on fracking’s water pollution disputed by its own scientists. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/19112015/fracking-water-pollution-epa-study-natural-gas-drilling>

<sup>342</sup> Woodwell, C. (2016, October 19). Pa. regulators fail to protect environment during Marcellus Shale boom. *Penn Live*. Retrieved from [http://www.pennlive.com/midstate/index.ssf/2015/10/state\\_regulators\\_fail\\_to\\_prote.html](http://www.pennlive.com/midstate/index.ssf/2015/10/state_regulators_fail_to_prote.html)

<sup>343</sup> Drollette, B. D., Hoelzer, K., Warner, N. R., Darrah, T. H., Karatum, O., O’Connor, M. P. . . . Plata, D. L. (2015). Elevated levels of diesel range organic compounds in groundwater near Marcellus gas operations are derived from surface activities. *Proceedings of the National Academy of Sciences*, 112(43). doi: 10.1073/pnas.1511474112

<sup>344</sup> Drollette B. D. & Plata, D. A. (2015, October 13). Hydraulic fracturing components in Marcellus groundwater likely from surface operations, not wells. *Phys.Org*. Retrieved from <http://phys.org/news/2015-10-hydraulic-fracturing-components-marcellus-groundwater.html>

those that are less altered and naturally sensitive to alteration.” Surface water in Pennsylvania’s Marcellus Shale region is classified by this model as vulnerable to fracking-related impacts because of steep slopes and loose, erodible soils within the watersheds.<sup>345</sup>

- July 30, 2015 – As reported by the *Los Angeles Times*, unlined waste pits and hillside spraying of oil-field wastewater have contaminated groundwater in Kern County, California. Five of six monitoring wells in the 94-acre waste site showed high levels of salt, boron, and chloride, but it is not known how far and fast the contaminated plume has traveled.<sup>346</sup>
- July 21, 2015 – By surveying records for 44,000 wells fracked between 2010 and 2013, researchers from Stanford University, Duke University, and Ohio State University attempted a first-ever assessment of the range of depths at which fracking occurs across the United States. They found that many wells are shallower than widely presumed.<sup>347</sup> As the authors noted, vertical fractures are able to propagate 2,000 feet upward, and hence, “shallow hydraulic fracturing often has greater potential risks of contamination than deeper hydraulic fracturing does.” This study showed that drinking water sources may be more vulnerable from upward migration of fracking contaminants than previously presumed. Surprisingly, the researchers found no strong relationship between depth and the volume of water and chemicals used for fracking. Many wells were both shallow and water-intensive, with significant variation in water use from state to state.<sup>348</sup>
- July 9, 2015 – A multi-volume report from the California Council of Science and Technology (CCST) found threats to groundwater in California from several parts of the fracking lifecycle, most notably from toxic wastewater. First, wastewater from California fracking operations is sometimes used for crop irrigation, in which case contaminants may seep from the surface of agricultural areas into groundwater. Second, nearly 60 percent of fracking wastewater in California is disposed of in unlined, open-air pits, a practice that is banned in almost all other states. There are 900 such waste disposal pits in the state, most of which are located in Kern County. Third, for many years, fracking wastewater in California has been mistakenly sent, via injection wells, directly into protected aquifers containing clean freshwater.<sup>349</sup> California’s Division of Oil, Gas and Geothermal Resources allowed fracking wastes to be injected into aquifers that it

<sup>345</sup> Entrekin, S. A., Maloney, K. O., Kapo, K. E., Walters, A. W., Evan-White, M. A., & Klemow, K. M. (2015). Stream vulnerability to widespread and emergent stressors: a focus on unconventional oil and gas. *PLoS One*, 10(9). doi:10.1371/journal.pone.0137416

<sup>346</sup> Cart, J. (2015, July 30). Central valley wastewater disposal to continue despite contamination. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/california/la-me-oil-waste-pits-20150731-story.html>

<sup>347</sup> Jordon, R. (2015, July 21). *Shallow fracking raises questions for water, new Stanford research shows*. [Press release]. Retrieved from [http://news.stanford.edu/news/2015/july/fracking\\_water-jackson-072115.html](http://news.stanford.edu/news/2015/july/fracking_water-jackson-072115.html)

<sup>348</sup> Jackson, R. B., Lowry, E. R., Pickle, A., Kang, M., DiGiullo, D., & Zhao, K. (2015). The depths of hydraulic fracturing and accompanying water use across the United States. *Environmental Science & Technology*, 49(15). 8969–8976. doi: 10.1021/acs.est.5b01228

<sup>349</sup> Shonkoff, S. B. C., Jordan, P., Hays, J., Stringfellow, W. T., Wettstein, Z. S., Harrison, R., Sandelin, W., & McKone, T. E. (2015, July 9). Volume II, Chapter 6: Potential impacts of well stimulation on human health in California. In: *An Independent Scientific Assessment of Well Stimulation in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from <http://ccst.us/publications/2015/vol-II-chapter-6.pdf>

believed were exempt from the U.S. Safe Drinking Water Act. Conceding this mistake, the agency has shut down 23 injection wells for fracking waste disposal and established a two-year timetable for phasing out other wells injecting waste into aquifers that should have been protected.<sup>350</sup> Fracking also threatens California's groundwater resources through water consumption, according to the CCST study. While this volume of water represents a small percentage of overall annual water consumption in California, fracking-related water use is, the study noted, disproportionately concentrated in areas of the state already suffering from water shortages. Further drawdowns of these aquifers may interfere with agricultural and municipal water needs.<sup>351</sup> In addition, because the oil-containing rock layers in California are located closer to the surface than in other states, the state's groundwater is potentially vulnerable to chemical contamination through vertical faults and fissures and via old and abandoned wells. The absence of evidence for direct contamination of groundwater by fracking, the study concluded, reflects absence of investigation rather than evidence of safety.<sup>352</sup>

- June 30, 2015 – The USGS released the first nationwide map of water usage for hydraulic fracturing. It shows wide geographic and temporal variation in the amount of water used to frack a single well. In general, gas wells consume more water per well (5.1 million gallons on average) than oil wells (4 million gallons). Median annual water volumes needed to frack a single horizontal oil or gas well increased dramatically—by a factor of 25 or more—between 2000 and 2014. A typical gas or oil well that is horizontally fracked now requires between six and eight Olympic-sized swimming pools of water. In 2014, the majority (58 percent) of new hydraulically fracked oil and gas wells were horizontally drilled. The watersheds where the most water was consumed for hydraulic fracturing are mostly located in southern or southwestern states and correspond to the following shale formations: the Eagle Ford and Barnett Shales in Texas; the Haynesville-Bossier Shale in Texas and Louisiana; the Fayetteville Shale in Arkansas; the Tuscaloosa Shale in Louisiana and Mississippi; and the Woodford Shale in Oklahoma. The Marcellus and Utica Shales—which underlie watersheds in parts of Ohio, Pennsylvania, West Virginia, and New York—were also in the top seven water-consuming shale plays in the United States.<sup>353</sup>
- June 26, 2015 – A decade-long USGS study of 11,000 public drinking water wells in California—nearly all the groundwater used for public supply—found high levels of potentially toxic contaminants in about 20 percent of the wells, affecting about 18 percent

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<sup>350</sup> Baker, D. R. (2015, July 16). U.S. likely to bar oil-waste dumping into 10 California aquifers. *San Francisco Chronicle*. Retrieved from <http://www.sfchronicle.com/business/article/U-S-likely-to-bar-oil-waste-dumping-into-10-6389677.php>

<sup>351</sup> Stringfellow, W. T., Cooley H., Varadharajan, C., Heberger, M., Reagan, M. T., Domen, J.K., . . . Houseworth, J. E. (2015, July 9). Volume II, Chapter 2: Impacts of well stimulation on water resources. In: *An Independent Scientific Assessment of Well Stimulation in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from <http://ccst.us/publications/2015/vol-II-chapter-2.pdf>

<sup>352</sup> Long, J. C. S, Birkholzer, J. T., & Feinstein, L. C. (2015, July 9). Summary report. In: *An Independent Scientific Assessment of Well Stimulation in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from: <http://ccst.us/publications/2015/2015SB4summary.pdf>

<sup>353</sup> Gallegos, T. J., Varela, B. A., Haines, S. S., & Engle, M. A. (2015). Hydraulic fracturing water use variability in the United States and potential environmental implications. *Water Resources Research*. Accepted author manuscript. doi: 10.1002/2015WR017278

of the state's population.<sup>354</sup> Although the study did not specifically investigate contaminants from oil and gas extraction, it does provide evidence for farm irrigation draining into groundwater, raising questions about the possible contamination of drinking water aquifers from the reuse of fracking wastewater for crop irrigation.<sup>355</sup>

- June 16, 2015 – A University of Texas research team documented widespread drinking water contamination throughout the heavily drilled Barnett Shale region in northern Texas. The study, which analyzed 550 water samples from public and private water wells, found elevated levels of 19 different hydrocarbon compounds associated with fracking (including the carcinogen benzene and the reproductive toxicant, toluene), detections of methanol and ethanol, and strikingly high levels of 10 different metals.<sup>356</sup> “In the abstract, we can’t state that unconventional oil and gas techniques are responsible,” the lead author, Zachariah Hildenbrand, said in a media interview. “But when you get into areas where drilling is happening, you find more instances of contamination. It’s not coincidental. There are causes for concern.”<sup>357</sup>
- June 5, 2015 – The EPA’s long-awaited 600-page draft report on the potential impacts of fracking for drinking water resources confirmed specific instances of drinking water contamination linked to drilling and fracking activities. The report also identified potential mechanisms, both above and below ground, by which drinking water resources can be contaminated by fracking. In some cases, drinking water was contaminated by spills of fracking fluid and wastewater. In other cases, “[b]elow ground movement of fluids, including gas . . . have contaminated drinking water resources.” The EPA investigators documented 457 fracking-related spills over six years but acknowledged that they do not know how many more may have occurred. Of the total known spills, 300 reached an environmental receptor such as surface water or groundwater. The EPA also conceded that insufficient baseline drinking water data and a lack of long-term systematic studies limited the power of its findings. The EPA investigation confirmed a number of specific instances where these potential mechanisms did indeed lead to drinking water contamination. An assertion in the EPA’s accompanying press release that it had not found “widespread, systemic impacts to drinking water resources” was quoted out of context by many media sources as proof that fracking poses little threat to drinking water. To the contrary, this report confirmed that drilling and fracking activities have contaminated drinking water in some cases and acknowledged that it cannot ascertain

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<sup>354</sup> Belitz, K., Fram, M. S., & Johnson, T. D. (2015). Metrics for assessing the quality of groundwater used for public supply, CA, USA: equivalent-population and area. *Environmental Science & Technology*, 9(14), 8330–8338. doi: 10.1021/acs.est.5b00265

<sup>355</sup> Knickmeyer E., & Smith, S. (2015, July 15). Study finds contaminants in California public-water supplies. *Associated Press*. Retrieved from <http://abcnews.go.com/Health/wireStory/study-finds-contaminants-california-public-water-supplies-32476456>

<sup>356</sup> Hildenbrand, Z. L., Carlton, D. D., Fontenot, B. E., Meik, J. M., Walton, J.L., Taylor, J. T., . . . Schug, K.A. (2015). A comprehensive analysis of groundwater quality in the Barnett Shale region. *Environmental Science & Technology*, 49(13), 8254-8262. doi: 10.1021/acs.est.5b01526

<sup>357</sup> McPhate, C. (2015, June 18). New study reveals potential contamination. *Denton Record-Chronicle*. Retrieved from <http://www.dentonrc.com/local-news/local-news-headlines/20150618-new-study-reveals-potential-contamination.ece>

how widespread the problem was due to insufficient data.<sup>358</sup> EPA Science Advisor Thomas A. Burke later clarified that the report does not show that fracking is safe. Burke said, “That is not the message of this report. The message of this report is that we have identified vulnerabilities in the water system that are really important to know about and address to keep risks as low as possible.”<sup>359</sup>

- May 19, 2015 – A Pennsylvania State University research team documented the presence of a fracking-related solvent, 2-n-Butoxyethanol, in the drinking water from three homes in Bradford County, Pennsylvania, as part of an investigation of private drinking water wells near drilling and fracking operations that contained methane and foam. This finding represents the first fully documented case of a commonly used fracking chemical entering a drinking water source. “The most likely explanation of the incident is that stray natural gas and drilling or [hydrofracking] compounds were driven ~1-3 km along shallow to intermediate depth fractures to the aquifer used as a potable water source.”<sup>360</sup> In an accompanying *New York Times* story, lead author Susan Brantley described the geology in northern Pennsylvania “as being similar to a layer cake with numerous layers that extend down thousands of feet to the Marcellus Shale. The vertical fractures are like knife cuts through the layers. They can extend deep underground, and can act like superhighways for escaped gas and liquids from drill wells to travel along, for distances greater than a mile away.”<sup>361</sup>
- May 15, 2015 – A research team from the University of Colorado Boulder and California State Polytechnic Institute developed a model for identifying which fracking fluid chemicals are most likely to contaminate drinking water. Of 996 fracking fluid compounds known to be in use, researchers screened 659 of them for their ability to persist, migrate, and reach groundwater aquifers over a short time scale. Of the fifteen compounds so identified, two were commonly used in fracking operations: naphthalene and 2-butoxyethanol. Both are ingredients in surfactants and corrosion inhibitors. The authors noted that 2-butoxyethanol has been detected in drinking water in a heavily fracked area of Pennsylvania. Exposure to 2-butoxyethanol has been linked to birth defects in animals. Naphthalene is a possible human carcinogen that is toxic to red blood cells and contributes to kidney and liver damage. Researchers did not consider the impact of mixtures, interactions between contaminants, or chemical transformations during the fracking or flowback process and noted, “the need for data on the degradation of many

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<sup>358</sup> U.S. EPA. (2015). *Assessment of the potential impacts of hydraulic fracturing for oil and gas on drinking water resources* (External review draft). U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-15/047, 2015. Retrieved from <http://cfpub.epa.gov/ncea/hfstudy/recordisplay.cfm?deid=244651>

<sup>359</sup> Ward Jr., K. (2015, June 7). EPA says new study doesn’t show fracking is safe. *Charleston Gazette*. Retrieved from <http://www.wvgazette.com/article/20150607/GZ01/150609432>

<sup>360</sup> Llewellyn, G. T., Dorman, F., Westland, J. L., Yoxheimer, D., Grieve, P. Sowers, T., . . . Brantley, S. L. (2015). Evaluating a groundwater supply contamination incident attributed to Marcellus Shale gas development. *Proceedings of the National Academies of Science*, 112, 6325-30. doi: 10.1073/pnas.1420279112/-/DCSupplemental

<sup>361</sup> St. Fleur, N. (2015, May 4). Fracking chemicals detected in Pennsylvania drinking water. *The New York Times*. Retrieved from [http://www.nytimes.com/2015/05/05/science/earth/fracking-chemicals-detected-in-pennsylvania-drinking-water.html?\\_r=0#addendums](http://www.nytimes.com/2015/05/05/science/earth/fracking-chemicals-detected-in-pennsylvania-drinking-water.html?_r=0#addendums)

compounds used in fracturing fluids under conditions relevant for groundwater transport.”<sup>362</sup>

- May 7, 2015 – A survey of streams in Arkansas, led by the University of Central Arkansas, found alterations in macroinvertebrate communities to be related to drilling and fracking operations in the Fayetteville Shale. Fracking activity near streams was associated with greater sediment and more chlorophyll. “This study suggests that land disturbance from gas development affected stream communities.”<sup>363</sup>
- April 20, 2015 – A USGS team analyzed water brought to the surface during natural gas extraction at 13 fracked wells in northern Pennsylvania. They found large variability in the VOCs and microorganisms in the water samples from different wells. Organic chemical contaminants included benzene, toluene, and perchloroethylene, chloroform, and methylene chloride. The presence of microbes was associated with concentrations of benzene and acetate. Despite the addition of biocides during the fracking process, hydrogen sulfide-producing bacteria were present at culturable levels, along with methanogenic and fermenting bacteria. The source of these microorganisms was not determined. “Therefore, we cannot exclude the possibility that these microorganisms are native to the shale formation and reactivated by [hydrofracking] activities, as their physiology does not indicate a terrestrial surficial source.”<sup>364</sup>
- April 8, 2015 – A University of Colorado Boulder research team’s analysis of the organic chemicals found in liquid waste that flowed out of gas wells in Colorado after they had been fracked revealed the presence of many fracking fluid additives, including biocides, which are potentially harmful if they leak into groundwater. According to the authors, treatment of fracking wastewater must include aeration, precipitation, disinfection, a biological treatment to remove dissolved organic matter, and reverse osmosis desalination in order for it to be appropriate for non-fracking uses, such as crop irrigation.<sup>365</sup>
- March 18, 2015 – Using a new stream-based monitoring method, a team of scientists with USGS, Pennsylvania State University, and University of Utah found elevated levels of methane in groundwater discharging into a stream near drilling and fracking operations in Pennsylvania. In this same area, several private water wells contained high levels of methane as a result of gas migration near a gas well with a defective casing. The

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<sup>362</sup> Rogers, J. D., Burke, T. L., Osborn, S. G., & Ryan, J. N. (2015). A framework for identifying organic compounds of concern in hydraulic fracturing fluids based on their mobility and persistence in groundwater. *Environmental Science & Technology Letters*, 2, 158-64.

<sup>363</sup> Johnson, E., Austin, B. J., Inlander, E., Gallipeau, C., Evans-White, M. A., & Entekin, S. (2015). Stream macroinvertebrate communities across a gradient of natural gas development in the Fayetteville Shale. *Science of the Total Environment*, 530-531, 323-32. doi: 10.1016/j.scitotenv.2015.05.027

<sup>364</sup> Akob, D. M., Cozzarelli, I. M., Dunlap, D. S., Rowan, E. L., & Lorah, M. M. (2015). Organic and inorganic composition and microbiology of produced waters from Pennsylvania shale gas wells. *Applied Geochemistry*, in press, corrected proofs online April 20. doi: 10.1016/j.apgeochem.2015.04.011

<sup>365</sup> Lester, Y., Ferrer, I., Thurman, E. M., Sitterley, K. A., Korak, J. A., Aiken, G., & Linden, K. G. (2015). Characterization of hydraulic fracturing flowback water in Colorado: Implications for water treatment. *Science of the Total Environment*, 512-513, 637-644. doi: 10.1016/j.scitotenv.2015.01.043



monitoring technique used by the scientists allowed them to demonstrate that the source of the methane was shale gas from the Middle Devonian period, which is the kind of gas found in the Marcellus Shale.<sup>366</sup> Researcher Susan Brantley said, “I found it compelling that using this new method for a reconnaissance of just 15 streams in Pennsylvania, we discovered one instance of natural gas entering the stream, perhaps from a nearby leaking shale gas well.”<sup>367</sup>

- March 12, 2015 – A team led by geologist Donald Siegel of Syracuse University found no relationship between methane levels in drinking water wells and proximity to oil or gas wells in a heavily fracked area of northeastern Pennsylvania.<sup>368</sup> However, Siegel failed to reveal in his paper — as is required by the journal — that he had received industry funding from the Chesapeake Energy Corporation. Subsequently, the journal published a lengthy correction that revealed that Chesapeake had not only privately funded the lead author but had provided the baseline groundwater data set. A second author was revealed to be a former employee of Chesapeake, and another had worked as a consultant in the energy sector.<sup>369</sup>
- March 3, 2015 – A Duquesne University study of private drinking water wells in an intensely drilled southwestern Pennsylvania community compared pre-drill and post-drill data on water quality and found changes in water chemistry that coincided with the advent of drilling and fracking activities. Levels of chloride, iron, barium, strontium, and manganese were elevated. In some cases, concentrations exceeded health-based maximum contaminant levels. Methane was detected in most houses tested. Surveys of residents revealed widespread complaints about changes in water quality that began after drilling and fracking operations commenced. Violation records from the PA DEP uncovered possible pathways for water contamination. The researchers concluded that alterations of local hydrology caused by the injection of large volumes of hydraulic fracturing fluids may have mobilized contaminants left over from legacy oil, gas, and mining operations as well as opened pathways for the migration of fracking fluids themselves.<sup>370</sup>

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<sup>366</sup> Heilweil, V. M., Grieve, P. L., Hynek, S. A., Brantley, S. L., Solomon, D. K., & Risser, D. W. (2015). Stream measurements locate thermogenic methane fluxes in groundwater discharge in an area of shale-gas development. *Environmental Science & Technology*, 49, 4057-4065. doi: 10.1021/es503882b

<sup>367</sup> U.S. Geological Survey. (2015, April 1). New stream monitoring method locates elevated groundwater methane in shale-gas development area. Retrieved from [http://www.usgs.gov/newsroom/article.asp?ID=4176&from=rss&utm\\_source=dlvr.it&utm\\_medium=facebookhttp://www.readcube.com/articles/10.1002%2F2014WR016382?r3\\_referer=wol&tracking\\_action=preview\\_click&show\\_checkout=1&purchase\\_site\\_license=LICENSE\\_DENIED\\_NO\\_CUSTOMER#.VaPKNYsqdyA](http://www.usgs.gov/newsroom/article.asp?ID=4176&from=rss&utm_source=dlvr.it&utm_medium=facebookhttp://www.readcube.com/articles/10.1002%2F2014WR016382?r3_referer=wol&tracking_action=preview_click&show_checkout=1&purchase_site_license=LICENSE_DENIED_NO_CUSTOMER#.VaPKNYsqdyA)

<sup>368</sup> Siegel, D. I., Azzolina, N. A., Smith, B. J., Perry, A. E., & Bothun, R. L. (2015). Methane concentrations in water wells unrelated to proximity to existing oil and gas wells in northeastern Pennsylvania. *Environmental Science & Technology*, 49, 4106-12. doi: 10.1021/es505775c

<sup>369</sup> Siegel, D. I., Azzolina, N. A., Smith, B. J., Perry, A. E., & Bothun, R. L. (2015). Correction to Methane concentrations in water wells unrelated to proximity to existing oil and gas wells in northeastern Pennsylvania. *Environmental Science & Technology*, 49, 4106-12. doi: 10.1021/es505775c

<sup>370</sup> Alawattagama, S. K., Kondratyuk, T., Krynock, R., Bricker, M., Rutter, J. K., Bain, D. J., & Stolz, J. F. (2015). Well water contamination in a rural community in southwestern Pennsylvania near unconventional shale gas extraction. *Journal of Environmental Science and Health, Part A: Toxic/Hazardous Substances and Environmental Engineering*, 50, 516-528. doi: 10.1080/10934529.2015.992684

- March 3, 2015 – A research team from Duquesne University reviewed the evidence for environmental impacts to air and water from activities related to shale gas extraction in Pennsylvania and explored potential mechanisms for contamination of air and water related to the drilling and fracking process itself. Among them: deformations of the shale bedrock caused by the injection of large volumes of fluid result in “pressure bulbs” that are translated through rock layers and can impact faults and fissures, so affecting groundwater.<sup>371</sup>
- February 23, 2015 – The arrival of drilling and fracking activities coincided with an increase in salinity in a creek that drains public land in a semi-arid region of Wyoming, determined a USGS study. The dissolved minerals associated with the rise in salinity matched those found in native soil salts, suggesting that disturbance of naturally salt-rich soils by ongoing oil and gas activities, including pipeline, road, and well pad construction, was the culprit. “As [shale gas and oil] development continues to expand in semiarid lands worldwide, the potential for soil disturbance to increase stream salinity should be considered, particularly where soils host substantial quantities of native salts.”<sup>372</sup>
- February 14, 2015 – A review by a *Dickinson Press* news reporter of disposal well files and more than 2,090 mechanical integrity tests revealed that North Dakota frack waste injection wells were often leaky and that state regulators continued to allow fluid injection into wells with documented structural problems even though the wells did not meet EPA guidelines for wellbore integrity. Officials with the North Dakota Division of Oil and Gas said they had primary enforcement responsibilities and that EPA guidance did not apply to these wells. The investigation noted, “... a review of state and federal documents, as well as interviews with geologists, engineers, environmental policy experts and lawyers who have litigated under the Safe Drinking Water Act, suggests the agency is loosely interpreting guidance and protocols that are meant to maintain the multiple layers of protection that separate aquifers from the toxic saltwater.” *The Dickinson Press* is the daily newspaper for Stark County in southwest North Dakota.<sup>373</sup>
- February 11, 2015 – The *Los Angeles Times* analyzed self-reported testing results on fracking wastewater that California drillers were required to submit to the state. Samples of wastewater collected from 329 fracked oil wells found that virtually all—98 percent—contained benzene at levels that exceeded standards for permissible concentrations in drinking water. This finding likely underrepresents the extent of the problem, according

<sup>371</sup> Lampe, D. J., & Stolz, J. F. (2015). Current perspectives on unconventional shale gas extraction in the Appalachian Basin. *Journal of Environmental Science and Health, Part A: Toxic/Hazardous Substances and Environmental Engineering*, 50(5), 434-446. doi: 10.1080/10934529.2015.992653

<sup>372</sup> Bern, C. R., Clark, M. L., Schmidt, T. S., Nolloway, J. M., & McDougal, R. R. (2015). Soil disturbance as a driver of increased stream salinity in a semiarid watershed undergoing energy development. *Journal of Hydrology*, 524, 123-136. doi: doi.org/10.1016/j.jhydrol.2015.02.020

<sup>373</sup> Brown, A. (2015, February 14). Lacking integrity? State regulatory officials don't follow EPA guidance on saltwater disposal wells. *The Dickinson Press*. Retrieved from <http://www.thedickinsonpress.com/energy/bakken/3679507-lacking-integrity-state-regulatory-officials-dont-follow-epa-guidance>

to the newspaper investigation, because many operators failed to comply with reporting requirements. The discovery that fracking wastewater is high in benzene is particularly alarming in light of the admission by the state of California that it had inadvertently allowed frack waste disposal directly into aquifers containing clean water that could potentially be used for drinking. Those wells are now the subject of federal and state review.<sup>374</sup>

- February 1, 2015 – An investigation of the chemical make-up of fracking fluid found that the compositions of these mixtures vary widely according to region and company, making the process of identifying individual compounds difficult. Classes of hydrocarbon-based chemicals include solvents, gels, biocides, scale inhibitors, friction reducers, and surfactants. Chemical analysis identified around 25 percent of the organic compounds that are believed to be present in fracking fluid and that are necessary to test for in identifying groundwater and drinking water contamination.<sup>375</sup> Dr. Imma Ferrer, lead author, explained in a *Science Daily* article about her research that “[b]efore we can assess the environmental impact of the fluid, we have to know what to look for.”<sup>376</sup>
- January 30, 2015 – A USGS review of national water quality databases found that insufficient data exist to understand the impact of fracking on drinking water.<sup>377</sup> In a media interview, lead author Zack Bowen said, “There are not enough data available to be able to assess the potential effects of oil and gas development over larger geographic areas.”<sup>378</sup>
- January 21, 2015 – A team of researchers from the USGS and Virginia Tech University established that petroleum-based hydrocarbons can break down underground in ways that promote the leaching of naturally occurring arsenic into groundwater. Arsenic is a known human carcinogen that causes bladder, lung, and skin cancer. Elevated levels of arsenic in drinking water represent a public health threat.<sup>379</sup> Researchers found that arsenic concentrations in a hydrocarbon plume can reach 23 times the current drinking water

<sup>374</sup> Cart. J. (2015, February 11). High levels of benzene found in fracking waste water. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/california/la-me-fracking-20150211-story.html#page=1>

<sup>375</sup> Ferrer, I., & Thurman, E.M. (2015), Chemical constituents and analytical approaches for hydraulic fracturing waters. *Trends in Environmental Analytical Chemistry*, 5, 18-25, doi: 10.1016/j.teac.2015.01.003

<sup>376</sup> Elsevier. (2015 April 8). Fracking fluids contain potentially harmful compounds if leaked into groundwater. *ScienceDaily*. Retrieved from [http://www.sciencedaily.com/releases/2015/04/150408090323.htm?utm\\_source=feedburner&utm\\_medium=email&utm\\_campaign=Feed%3A+sciencedaily%2Fearth\\_climate%2Frecycling\\_and\\_waste+%28Recycling+and+Waste+News+-+](http://www.sciencedaily.com/releases/2015/04/150408090323.htm?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+sciencedaily%2Fearth_climate%2Frecycling_and_waste+%28Recycling+and+Waste+News+-+)

<sup>377</sup> Bowen, Z. H., Oeisner, G. P., Cade, B., Gallegos, T. J., Farag, A. M., Mott, D. N., . . . Varela, B. A. (2015). Assessment of surface water chloride and conductivity trends in areas of unconventional oil and gas development—why existing national data sets cannot tell us what we would like to know. *Water Resources Research*, 51, 704-15. doi: 10.1002/2014WR016382

<sup>378</sup> Phillips, S. (2015, March 3). USGS: fracking water quality data “scarce.” *StateImpact Pennsylvania*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2015/03/03/usgs-fracking-water-quality-data-scarce/>

<sup>379</sup> U.S. Geological Survey (2015, January. 26). Natural breakdown of petroleum underground can lace arsenic into groundwater. Retrieved from [http://www.usgs.gov/newsroom/article.asp?ID=4110&from=rss&utm\\_source=dlvr.it&utm\\_medium=facebook#.VavGXIsqdyA](http://www.usgs.gov/newsroom/article.asp?ID=4110&from=rss&utm_source=dlvr.it&utm_medium=facebook#.VavGXIsqdyA)

standard of 10 micrograms per liter. The authors of the study said that the metabolism of carbon-rich petroleum products by subterranean microbes is involved in a complex geochemical process that leads to mobilization of arsenic into aquifers.<sup>380</sup>

- January 14, 2015 – Researchers from Duke University, Dartmouth College, and Stanford University found high levels of iodide, bromide, and ammonium in samples of wastewater from fracking operations in both the Marcellus and Fayetteville Shales. These same chemicals were present when fracking wastewater was discharged into rivers and streams at three treatment sites in Pennsylvania and during an accidental spill in West Virginia. Iodide and bromide are known to create toxic disinfection byproducts when downstream water is subsequently chlorinated for drinking water. In water, ammonium can convert to ammonia, which is toxic to aquatic life. The authors noted that this is the first study to identify ammonium and iodide as widespread in fracking waste discharges.<sup>381</sup> In an interview with the *Pittsburgh Post-Gazette*, lead author Avner Vengosh said that the findings raise new concerns about the environmental and health impacts of wastewater from drilling and fracking operations.<sup>382</sup>
- November 27, 2014 – An interdisciplinary team of researchers found methane contamination in drinking water wells located in eight areas above the Marcellus Shale in Pennsylvania and the Barnett Shale in Texas, with evidence of declining water quality in the Barnett Shale area. By analyzing noble gases and their isotopes (helium, neon, argon), the investigators were able to isolate the origin of the fugitive methane in drinking water. The results implicate leaks through cement well casings as well as via naturally occurring cracks and fissures in the surrounding rock.<sup>383</sup> In a related editorial, one of the study's authors, Robert Jackson, called on the EPA to reopen its aborted investigation into drinking water contamination in heavily fracked areas of Texas. Jackson also emphasized that methane migration through unseen cracks in the rock surrounding the wellbore “raises the interesting possibility that a drilling company could follow procedures — cementing and casing below the local aquifer — and still create a potential pathway for gas to migrate into drinking water.”<sup>384</sup>
- November 26, 2014 – A critical review of biocides in fracking fluid by a Colorado State team found that the fate of these chemicals underground is not known and their toxicity not well understood. While many biocides are short-lived, some may transform into more

<sup>380</sup> Cozzarelli, I. M. Schreiber, M. D., Erickson, M. L., & Ziegler, B. A. (2015). Arsenic cycling in hydrocarbon plumes: secondary effects of natural attenuation. *Groundwater*. doi: 10.1111/gwat.12316

<sup>381</sup> Harkness, J. S., Dwyer, G. S., Warner, N. R., Parker, K. M., Mitch, W. A., & Vengosh, A. (2015). Iodide, bromide, and ammonium in hydraulic fracturing and oil and gas wastewaters: environmental implications. *Environmental Science & Technology*, 49, 1955-63. doi: 10.1021/es504654n

<sup>382</sup> Hopey, D. (2015, January 15). Study: high levels of pollutants from drilling waste found in Pa. rivers. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/latest-oil-and-gas/2015/01/14/Study-High-levels-of-pollutants-from-drilling-waste-found-in-Pennsylvania-rivers-shale/stories/201501140143>

<sup>383</sup> Darrah, T. H., Vengosh, A., Jackson, R. B., Warner, N. R., & Poreda, R. J. (2014). Noble gases identify the mechanisms of fugitive gas contamination in drinking-water wells overlying the Marcellus and Barnett Shales. *Proceedings of the National Academy of Sciences*, 111 (39), 14076-14081. doi: 10.1073/pnas.1322107111

<sup>384</sup> Jackson, R. (2014, December 1). Reopen Barnett Shale water probe. *The Texas Tribune*. Retrieved from <http://tribtalk.org/2014/12/01/reopen-barnett-shale-water-probe/>

toxic or persistent compounds. Among the most common chemical components of fracking fluid, biocides are used to inhibit the growth of deep-life microorganisms, including sulfate-reducing bacteria that contribute to corrosion of well casings and can form biofilms that prevent the upward flow of natural gas. Oxidizing biocides that are chlorine- or bromine-based can react with other fracking chemicals and may produce toxic halogenated byproducts. The authors noted biocides pose a unique risk for drinking water when fracking liquid waste is treated for discharge to surface water via sewage treatment plants. Sub-lethal concentrations may contribute to adaptation of surviving microorganisms and, hence, antibiotic resistance of pathogens. They cited particular concern over surface spills and well integrity issues associated with casing or cement failure.<sup>385</sup>

- November 3, 2014 – The West Virginia Department of Environmental Protection confirmed that three private drinking water wells were contaminated when Antero Resources mistakenly drilled into one of its own gas wells. Benzene, a human carcinogen, and toluene, a reproductive toxicant, were detected in the drinking water at concentrations four times the legal maximum limit. Additionally, a nearby abandoned gas well, a drinking water well, and an actively producing gas well were all pressurized as a result of the mishap and began exhibiting “artesian flow.”<sup>386</sup>
- October 22, 2014 – A follow-up to the August 2014 Environmental Integrity Project report describes an even greater potential public health threat from a loophole in the Safe Drinking Water Act, wherein companies are allowed to inject other petroleum products (beyond diesel) without a permit, and many of these non-diesel drilling fluids contain even higher concentrations of the same toxins found in diesel. The authors recommend that “EPA should revisit its guidance and broaden the categories of diesel products that require Safe Drinking Water Act permits before they can be injected into oil and gas wells.”<sup>387</sup>
- October 20, 2014 – While developing a technique to fingerprint and trace accidental releases of hydraulic fracturing fluids, researchers showed that liquid waste from shale gas fracking operations is chemically different than waste flowing out of conventional wells. The researchers hypothesized that the hydraulic fracturing process itself liberates elements from clay minerals in the shale formations, including boron and lithium, which then enter the liquid waste.<sup>388</sup>

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<sup>385</sup> Kahrilas, G. A. Blotevogel, J., Stewart, P. S., & Borch, T. (2015). Biocides in hydraulic fracturing fluids: a critical review of their usage, mobility, degradation, and toxicity. *Environmental Science & Technology*, 49,16-32. doi: 10.1021/es503724k

<sup>386</sup> Board, G. (2014, November 3). September drilling accident contaminated water in Doddridge County. *West Virginia Public Broadcasting*. Retrieved from <http://wvpublic.org/post/dep-september-drilling-accident-contaminated-water-doddridge-county>

<sup>387</sup> Schaeffer, E., & Bernhardt, C. (2014, October 22). Fracking’s toxic loophole. The Environmental Integrity Project. Retrieved from <http://environmentalintegrity.org/wp-content/uploads/FRACKINGS-TOXIC-LOOPHOLE.pdf>

<sup>388</sup> Warner, N. R., Darrah, T. H., Jackson, R. B., Millot, R., Kloppmann, W., & Vengosh, A. (2014). New tracers identify hydraulic fracturing fluids and accidental releases from oil and gas operations. *Environ. Sci. Technol.*, 48(21), 12552–12560. doi: 10.1021/es5032135

- October 15, 2014 – Four thousand gallons of liquid fracking waste dumped into Waynesburg sewer system was discovered by sewage treatment plant workers in Greene County, Pennsylvania. The Department of Environmental Protection surmised that “someone removed a manhole cover in a remote location and dumped the fluid.” The treatment plant discharges into a creek that feeds the Monongahela River, which provides drinking water to more than 800,000 people.<sup>389</sup>
- October 6, 2014 – A state investigation that found no fracking-related water contamination in a drinking water well in Pennsylvania’s Washington County was invalidated by testimony presented to the state Environmental Hearing Board. Not all contaminants that were present in the water were reported, and the investigation relied on obsolete testing methods. More sophisticated testing revealed the presence of several chemical contaminants in the well water. The well is located 2,800 feet down gradient from a drilling site and fracking waste pit where multiple spills and leaks more than four years earlier had contaminated two springs.<sup>390</sup>
- September 23, 2014 – In a two-part audit of records, the GAO found that the EPA is failing to protect U.S. drinking water sources from fracking-related activities such as waste disposal via injection wells. Nationwide, 172,000 injection wells accept fracking waste; some are known to have contaminated drinking water. And yet, both short-term and long-term monitoring is lax, and record-keeping varies widely from state to state. The EPA neither mandates nor recommends a fixed list of chemicals for monitoring on the grounds that “injection fluids can vary widely in composition and contain different naturally occurring chemicals and fluids used in oil and gas production depending on the source of the injection fluid.”<sup>391</sup> Disposal of oil and gas waste via injection wells is, in fact, subject to regulation under the Safe Drinking Water Act, but, in practice, no one knows exactly what the waste contains, and regulations are deficient. In the United States, at least two billion gallons of fluids are injected into the ground *each day* to enable oil and gas extraction via fracking or to dispose of liquid waste from fracking operations.<sup>392, 393</sup>
- September 18, 2014 – Range Resources was fined a record \$4.5 million by the Pennsylvania Department of Environmental Protection for contaminating groundwater.

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<sup>389</sup> Hopey, D. (2014, October 15). Waynesburg officials investigate dumping of fracking wastewater. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/news/environment/2014/10/15/Waynesburg-investigates-dumping-of-fracking-wastewater/stories/201410150056>

<sup>390</sup> Hopey, D. (2014, October 6). Testimony: obsolete tests tainted shale analysis. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/companies-powersource/2014/10/06/Testimony-Obsolete-tests-tainted-shale-analysis/stories/201410060075>

<sup>391</sup> U.S. Government Accountability Office. (2014, September 23). Drinking water: characterization of injected fluids associated with oil and gas production. GAO-14-657R. Retrieved from <http://www.gao.gov/products/GAO-14-857R>.

<sup>392</sup> Sadasivam N. (2014, July 29). Report criticizes EPA oversight of injection wells, *ProPublica*. Retrieved from <http://www.propublica.org/article/report-criticizes-epa-oversight-of-injection-wells>

<sup>393</sup> U.S. Government Accountability Office. (June 27, 2014). EPA program to protect underground sources from injection of fluids associated with oil and gas production needs improvement. GAO-14-555. Retrieved from <http://www.gao.gov/products/GAO-14-555>

The culprits were six leaking pits in Washington County that each held millions of gallons of fracking wastewater.<sup>394</sup>

- September 12, 2014 – A Pennsylvania State ecosystems scientist, together with USGS scientists, reviewed the current knowledge of the effects of fracking and its associated operations on terrestrial and aquatic ecosystems in 20 shale plays in the U.S. Findings of species and habitats at highest risk include (in addition to land-based examples) vernal pond inhabitants and stream biota. The research builds on previous reviews identifying “three main potential stressors to surface waters: changes in water quantity (hydrology), sedimentation, and water quality.” Researchers determined that there are no published data specifically on the effects of fracking on forest-dwelling amphibians, but “many species breed in vernal ponds which are negatively affected by changes in water quantity and quality and direct disturbance. Many amphibians are also highly sensitive to road salts.” Given that the U.S. EPA recently found 55 percent of all rivers and streams to be in poor condition, these researchers warned, “Large-scale development of shale resources might increase these percentages.” They expressed concern for the native range of brook trout by the cumulative effects of shale development, especially in Pennsylvania.<sup>395</sup>
- September 9, 2014 – A research team from Stanford and Duke Universities discovered that fracking wastewater processed by sewage treatment plants contributes to the formation of carcinogenic chemical byproducts. These raise public health risks when downstream surface water is used for drinking. Even when fracking wastewater was diluted by a factor of 10,000, the bromides and iodides in the waste reacted with organic matter to create highly toxic halogenated compounds—at troublingly high concentrations. These toxic compounds are not filterable by municipal wastewater treatment plants. Halogenated disinfection byproducts in drinking water are linked to both colon and bladder cancers.<sup>396</sup>
- August 29, 2014 – A review of Pennsylvania Department of Environmental Protection files on fracking-related damage to drinking water—which are kept on paper and stored in regional offices—revealed that 243 private water supplies in 22 counties had been contaminated or had lost flow and dried up as a result of nearby drilling and fracking operations in the past seven years. Pollutants included methane, metals, and salts as well as carbon-based compounds (ethylene glycol and 2-butoxyethanol) that are known to be constituents of fracking fluid. As reported by the *Pittsburgh Post-Gazette*, this tally—which came as a response to multiple lawsuits and open-records requests by media

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<sup>394</sup> Hopey, D. (2014, September 18). Range resources to pay \$4.15M penalty. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/local/2014/09/18/DEP-orders-Range-Resources-to-pay-4-million-fine/stories/201409180293>

<sup>395</sup> Brittingham, M. C., Maloney, K. O., Farag, A. M., Harper, D. D., & Bowen, Z. H. (2014). Ecological risks of shale oil and gas development to wildlife, aquatic resources and their habitats. *Environmental Science & Technology*, 48(19), 11034–11047. doi: [dx.doi.org/10.1021/es5020482](https://doi.org/10.1021/es5020482)

<sup>396</sup> Parker, K. M., Zeng, T., Harkness, J., Vengosh, A., & Mitch, W. A. 2014. Enhanced formation of disinfection byproducts in shale gas wastewater-impacted drinking water supplies. *Environmental Science & Technology*, 48(19), 11161–11169. doi: [10.1021/es5028184](https://doi.org/10.1021/es5028184)

sources—was the first time the agency “explicitly linked a drilling operation to the presence of industrial chemicals in drinking water.”<sup>397, 398</sup>

- August 13, 2014 – Over the last decade, drilling companies have repeatedly claimed they are no longer using diesel fuel in fracking, although a 2011 investigation by U.S. House Democrats concluded otherwise. The Environmental Integrity Project examined disclosure data submitted to FracFocus and identified at least 351 wells in 12 states that have been fracked over the last four years with one or more of the five prohibited products identified as diesel. EIP researchers also discovered numerous fracking fluids with high diesel content for sale online, including over a dozen products sold by Halliburton and advertised as additives, friction reducers, emulsifiers, etc.<sup>399</sup>
- August 13, 2014 – An international team of researchers found high levels of carbon-based compounds in liquid fracking waste. These impurities can react with chlorine and bromine to create toxic byproducts. This study suggests that chemical treatment of liquid fracking waste will magnify its toxic potency, as will reusing and recycling it.<sup>400</sup> The European Commission subsequently published a summary of these findings.<sup>401</sup>
- August 13, 2014 – A team from Lawrence Berkeley National Laboratory reported that scientific efforts to understand the hazards of fracking continue to be hampered by industry secrecy. A comprehensive examination of the chemical formulations of fracking fluid—whose precise ingredients are protected as proprietary business information—revealed that no publicly available toxicity or physical chemical information was available for one-third of all the fracking chemicals surveyed. Another ten percent of chemicals, including biocides and corrosion inhibitors, were known to be toxic to mammals.<sup>402, 403</sup>

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<sup>397</sup> Pennsylvania Department of Environmental Protection. (2014 August 29). Water supply determination letters. Retrieved from [http://files.dep.state.pa.us/OilGas/BOGM/BOGMPortalFiles/OilGasReports/Determination\\_Letters/Regional\\_Determination\\_Letters.pdf](http://files.dep.state.pa.us/OilGas/BOGM/BOGMPortalFiles/OilGasReports/Determination_Letters/Regional_Determination_Letters.pdf)

<sup>398</sup> Legere, L. (2014, September 9). DEP releases updated details on water contamination near drilling sites: some 240 private supplies damaged by drilling in the past 7 years. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/policy-powersource/2014/09/09/DEP-releases-details-on-water-contamination/stories/201409090010>

<sup>399</sup> Greene, M. (2014, August 13). Fracking beyond the law: Despite industry denials, investigation reveals continued use of diesel in hydraulic fracturing. The Environmental Integrity Project. Retrieved from <http://environmentalintegrity.org/wp-content/uploads/Fracking-Beyond-the-Law.pdf>

<sup>400</sup> Maguire-Boyle, S. J., & Barron, A. R. (2014). Organic compounds in produced waters from shale gas wells. *Environmental Science: Processes & Impacts*, 16, 2237-2248. doi: 10.1039/C4EM00376D

<sup>401</sup> European Commission. (2015, February 19). Chemical composition of fracking wastewater. *Science for Environment Policy*, 404. Retrieved from [http://ec.europa.eu/environment/integration/research/newsalert/pdf/chemical\\_composition\\_of\\_fracking\\_wastewater\\_404na4\\_en.pdf](http://ec.europa.eu/environment/integration/research/newsalert/pdf/chemical_composition_of_fracking_wastewater_404na4_en.pdf)

<sup>402</sup> Stringfellow, W. T., Domen, J. K., Carmarillo, M. K., Sandelin, W. L., Tinnacher, R., Jordan, P., . . . Birkholzer, J. (August 13, 2014). Characterizing compounds used in hydraulic fracturing: a necessary step for understanding environmental impacts. Presentation before the American Chemical Society conference, San Francisco. Abstract retrieved from [http://abstracts.acs.org/chem/248nm/program/view.php?obj\\_id=262051&terms=](http://abstracts.acs.org/chem/248nm/program/view.php?obj_id=262051&terms=)

<sup>403</sup> Robinson, P. (2014, August 19). Fracking fluid survey shows missing information. *Scientific American*. Retrieved from <http://www.scientificamerican.com/article/fracking-fluid-survey-shows-missing-information/>



- August 12, 2014 – A Stanford University research team working in the Pavillion gas basin in Wyoming documented that fracking in shallow layers of bedrock, including those that serve as drinking water aquifers, is not uncommon. This finding overturns the industry claim that oil and gas deposits targeted by fracking operations are located at much greater depths than underground drinking water sources and are isolated from them by hundreds of feet of impermeable rock. Because it is exempt from provisions of the Safe Drinking Water Act, fracking in drinking water aquifers is not prohibited by law.<sup>404</sup>
- August 3, 2014 – An investigation by the *Pittsburgh Post-Gazette* found that half of all fracking-related spills that resulted in violations and fines were not discovered by the gas companies themselves, even though Pennsylvania state law requires them to pro-actively seek and report such incidents. The newspaper’s analysis of hundreds of thousands of state and company documents showed that self-regulation in the gas fields is a failure. One-third of all spills were discovered by state inspectors, while one-sixth were found by residents. Likely, much contamination is entirely undetected and unreported.<sup>405</sup>
- July 21, 2014 – An investigation by the *Columbus Dispatch* showed that Halliburton delayed disclosure to federal and state EPA agencies of the full list of chemicals that spilled into a creek following a fire on one of its well pad in Monroe County, Ohio. Although the creek is an important supply of drinking water for downstream communities and the spill precipitated a mass die-off of fish and other aquatic wildlife, five full days passed before EPA officials were provided a full inventory of chemicals used at Halliburton’s operation. As a result, the public was denied knowledge of potential chemical exposures.<sup>406</sup>
- July 17, 2014 – A team of environmental scientists, biologists, and engineers, from institutions including the University of Michigan and McGill University, assessed the current state of understanding of the impact fracking and its associated activities have on the ecological health of surface waters. Though various approaches such as geographic information systems and site monitoring provide insights into potential risks to aquatic ecosystems, the authors concluded that inadequate data currently exist. They identified possible outcomes such as, “erosion and sedimentation, increased risk to aquatic ecosystems from chemical spills or runoff, habitat fragmentation, loss of stream riparian

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<sup>404</sup> Banerjee, N. (2014, August 12). Oil companies fracking into drinking water sources, new research finds. *Los Angeles Times*. Retrieved from <http://www.latimes.com/nation/la-na-fracking-groundwater-pavillion-20140811-story.html#page=1>

<sup>405</sup> Hamill, S. D. (2014, August 3). Drillers did not report half of spills that led to fines. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/news/state/2014/08/03/Drillers-did-not-report-half-of-spills-that-led-to-fines/stories/201408020142>

<sup>406</sup> Arenschield, L. (2014, July 21). Halliburton delayed releasing details on fracking chemicals after Monroe County spill. *The Columbus Dispatch*. Retrieved from <http://www.dispatch.com/content/stories/local/2014/07/21/details-on-chemicals-trickle-in-after-spill.html>

zones, altered biogeochemical cycling, and reduction of available surface and hyporheic water volumes because of withdrawal-induced lowering of local groundwater levels.”<sup>407</sup>

- July 7, 2014 – California Department of Gas, Oil, and Geothermal Resources ordered seven energy companies to stop injecting liquid fracking waste into aquifers. The ongoing drought that has compelled farmers to supplement irrigation with water drawn from groundwater sources prompted state officials to look at the status of aquifers previously considered too deep for use or too poor in quality. They discovered that at least seven injection wells were very likely pumping liquid fracking waste into protected groundwater supplies rather than aquifers that had been sacrificed for the purpose of waste disposal. Across the United States, more than 1000 aquifers are exempt from any type of pollution protection at all, and many of these are in California, according to a related *ProPublica* investigation.<sup>408</sup>
- June 25, 2014 – A study by Cornell University researchers found that fracking fluid and fracking wastewater mobilized previously deposited chemical contaminants in soil particles in ways that could potentially exacerbate the impacts of fracking fluid spills or leaks. The research team concluded that, by interfering with the ability of soil to bond to and sequester pollutants such as heavy metals, fracking fluids may release from soils an additional repository of contaminants that could migrate into groundwater.<sup>409</sup>
- June 23, 2014 – Building on earlier findings that water samples collected from sites with confirmed fracking spills in Garfield County, Colorado exhibited moderate to high levels of estrogen and androgen-disrupting activity, a University of Missouri team extended their investigation to other types of hormonal effects. As reported at a joint meeting of the International Society of Endocrinology and the Endocrine Society, their research documented that commonly used fracking chemicals can also block the receptors for thyroid hormone, progesterone, and glucocorticoids (a family of hormones involved in both fertility and immune functioning). Of 24 fracking chemicals tested, all 24 interfered with the activity of one or more important hormone receptors. There is no known safe level of exposure to hormone-disrupting chemicals.<sup>410</sup>
- May 11, 2014 – According to the GAO, the federal government is failing to inspect thousands of oil and gas wells located on public land, including those that pose special

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<sup>407</sup> Burton Jr., G. A., Basu, N., Ellis, B. R., Kapo, K. E., Entrekin, S. & Nadelhoffer, K. (2014). Hydraulic “fracking”: are surface water impacts an ecological concern? *Environmental Toxicology and Chemistry*, 33(8), 1679-1689.

<sup>408</sup> Lustgarten, A. (2014, July 18). California halts injects of fracking waste, warning it may be contaminating aquifers. *ProPublica*. Retrieved from <http://www.propublica.org/article/ca-halts-injection-fracking-waste-warning-may-be-contaminating-aquifers>

<sup>409</sup> Sang, W., Stoof, C., Zhang, W., Morales, V., Gao, B., Kay, R., . . . Steenhuis, T. (2014). Effect of hydrofracking fluid on colloid transport in the unsaturated zone. *Environmental Science & Technology*, 48(14), 8266–8274. Retrieved from <http://pubs.acs.org/doi/abs/10.1021/es501441e>

<sup>410</sup> The Endocrine Society (2014, June 23). Hormone-disrupting activity of fracking chemicals worse than initially found. *Science Daily*. Retrieved from [http://www.sciencedaily.com/releases/2014/06/140623103939.htm?utm\\_source=feedburner&utm\\_medium=email&utm\\_campaign=Feed%3A+sciencedaily%2Ftop\\_news%2Ftop\\_health+%28ScienceDaily%3A+Top+Health+News%29](http://www.sciencedaily.com/releases/2014/06/140623103939.htm?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+sciencedaily%2Ftop_news%2Ftop_health+%28ScienceDaily%3A+Top+Health+News%29)

risks of water contamination or other environmental damage. An investigation by the Associated Press found that the Bureau of Land Management “had failed to conduct inspections on more than 2,100 of the 3,702 wells that it had specified as ‘high priority’ and drilled from 2009 through 2012. The agency considers a well ‘high priority’ based on a greater need to protect against possible water contamination and other environmental safety issues.”<sup>411</sup>

- March 25, 2014 – An industry-funded study of oil and gas well integrity found that more than six percent of wells in a major shale exploration region in Pennsylvania showed evidence of leaking and conceded that this number is likely an underestimate. Researchers concluded that the percentage of wells with some form of well barrier or integrity failure is highly variable and could be as high as 75 percent. A separate analysis in the same study found 85 examples of cement or casing failures in Pennsylvania wells monitored between 2008 and 2011.<sup>412</sup>
- March 7, 2014 – In a comprehensive evaluation, Duke University scientists and colleagues reviewed the state of knowledge on possible effects of shale gas and hydraulic fracturing on water resources in the United States and concluded, “Analysis of published data (through January 2014) reveals evidence for stray gas contamination, surface water impacts in areas of intensive shale gas development, and the accumulation of radium isotopes in some disposal and spill sites.”<sup>413</sup>
- February 19, 2014 – A Pennsylvania court found a gas corporation guilty of contaminating a woman’s drinking water well in Bradford County. Methane levels after fracking were 1,300-2,000 times higher than baseline, according to the court brief. Iron levels and turbidity had also increased. The brief stated, “In short, Jacqueline Place lived for ten months deprived totally of the use of her well, and even after its ‘restoration,’ has been burdened with a water supply with chronic contamination, requiring constant vigilance and ongoing monitoring.”<sup>414</sup>
- January 16, 2014 – Data from the Colorado Oil and Gas Conservation Commission showed that fracking-related chemical spills in Colorado exceed an average rate of one spill per day. Of the 495 chemical spills that occurred in that state over a one-year period of time, nearly a quarter impacted ground or surface water. Sixty-three of the spills spread within 1,500 feet of pigs, sheep, and cows; 225 spread within 1,500 feet of

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<sup>411</sup> Yen, H. (2014, May 11). Fed govt failed to inspect higher risk oil wells. *Associated Press*. Retrieved from <http://bigstory.ap.org/article/fed-govt-failed-inspect-higher-risk-oil-wells>

<sup>412</sup> Davies, R. J., Almond, S., Ward, R. S., Jackson, R. B., Adams, C., Worrall, F., . . . Whitehead, M. A. (2014). Oil and gas wells and their integrity: Implications for shale and unconventional resource exploitation. *Marine and Petroleum Geology*, 56, 239-254. doi: 10.1016/j.marpetgeo.2014.03.001

<sup>413</sup> Vengosh, A., Jackson, R. B., Warner, N., Darrah, T. H., & Kondash, A. (2014). A critical review of the risks to water resources from unconventional shale gas development and hydraulic fracturing in the United States [Abstract]. *Environmental Science & Technology*. doi: 10.1021/es405118y

<sup>414</sup> Gibbons, B. (2014, February 19). Woman wins case against Chesapeake Jaqueline Place of Terry Township to receive compensation for well contamination. *The daily review.com*. Retrieved from <http://thedailyreview.com/news/woman-wins-case-against-chesapeake-jaqueline-place-of-terry-township-to-receive-compensation-for-well-contamination-1.1636832>

buildings.<sup>415</sup>

- January 10, 2014 – Duke University water tests revealed ongoing water contamination in Parker County, Texas, providing evidence that the EPA had prematurely ended its prior investigation into the water contamination.<sup>416</sup> A letter sent to the EPA from more than 200 environmental organizations called on the agency to re-open its investigation.<sup>417</sup>
- January 5, 2014 – An Associated Press investigation into drinking water contamination from fracking in four states—Pennsylvania, Ohio, West Virginia, and Texas—found many cases of confirmed water contamination and hundreds more complaints. The Associated Press noted that their analysis “casts doubt on industry view that it rarely happens.”<sup>418</sup>
- December 24, 2013 – A report from the EPA Inspector General concluded that evidence of fracking-related water contamination in Parker County, Texas was sound and faulted the EPA for prematurely ending its investigation there, relying on faulty water testing data from the gas industry in doing so, and failure to intervene when affected residents’ drinking water remained unsafe.<sup>419</sup> As reported by *Business Insider*, “The EPA Screwed Up When It Dropped This Fracking Investigation.”<sup>420</sup>
- December 16, 2013 – Lead by Susan Nagel of the University of Missouri School of Medicine, researchers documented endocrine-disrupting properties in chemicals commonly used as ingredients of fracking fluid and found similar endocrine-disrupting activity in groundwater and surface water samples collected near drilling and fracking sites in Garfield County, Colorado. Endocrine disruptors are chemicals that interfere with the activity of hormones in the body and, at very low concentrations, can raise the risk of reproductive, metabolic, and neurological disorders, especially when exposures occur in early life.<sup>421, 422, 423</sup>

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<sup>415</sup> Tomasic, J. (2014, January 16). Colorado drilling data: More than a spill a day. *The Colorado Independent*. Retrieved from <http://www.coloradoindependent.com/145629/colorado-drilling-data-more-than-a-spill-a-day>

<sup>416</sup> Drajem, M. (2014, January 9). Duke fracking tests reveal dangers driller's data missed. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2014-01-10/epa-s-reliance-on-driller-data-for-water-irks-homeowners.html>

<sup>417</sup> Drajem, M. (2014, January 27). EPA needs fracking review: 'Gasland' maker, environmentalists. *Bloomberg*. Retrieved from <http://go.bloomberg.com/political-capital/2014-01-27/epa-needs-fracking-review-gasland-producer-environmentalists-say/>.

<sup>418</sup> Begos, K. (2014, January 05). 4 states confirm water pollution from drilling. *USA Today*. Retrieved from <http://www.usatoday.com/story/money/business/2014/01/05/some-states-confirm-water-pollution-from-drilling/4328859/>

<sup>419</sup> Banjeree, N. (2013, December 24). EPA report on fracking in Texas raises new concerns. *Los Angeles Times*. Retrieved from <http://www.latimes.com/nation/la-na-epa-fracking-20131225,0,6042944.story#ixzz2oVB9FXVY>

<sup>420</sup> Miedema, D. (2013, December 25). The EPA screwed up when it dropped this fracking investigation. *Business Insider*. Retrieved from <http://www.businessinsider.com/epa-criticized-for-dropping-fracking-investigation-2013-12>

<sup>421</sup> Kassotis, C. D., Tillitt, D. E., Davis, J. W., Hormann, A. M., & Nagel, S. C. (2013). Estrogen and androgen receptor activities of hydraulic fracturing chemicals and surface and ground water in a drilling-dense region. *Endocrinology*. doi: 10.1210/en.2013-1697

<sup>422</sup> Banerjee, N. (2013, December 16). Hormone-disrupting chemicals found in water at fracking sites. *Los Angeles Times*. Retrieved from <http://articles.latimes.com/2013/dec/16/science/la-sci-fracking-health-20131217>

<sup>423</sup> Endocrine Society. (2013, December 16). Fracking chemicals disrupt hormone function. *ScienceDaily*. Retrieved from [www.sciencedaily.com/releases/2013/12/131216140428.htm](http://www.sciencedaily.com/releases/2013/12/131216140428.htm)

- December 7, 2013 – Reporting on the second gas leak at a single gas well in one month, the Fort Worth *Star-Telegram* uncovered another inherent risk of fracking for groundwater contamination: Silica sand, which is used as an ingredient in fracking fluid for its ability to prop open the shale fractures, can damage steel pipes as it flows back up the well along with the gas. According to Dan Hill, head of the petroleum engineering department at Texas A&M University, new wells are the most susceptible to sand erosion because “the amount of sand and gas rushing through valves and flow lines is at its greatest when a well first goes into production.”<sup>424</sup>
- November 28, 2013 – An Associated Press investigation uncovered nearly 300 oil pipeline spills in North Dakota in the previous ten months, all with no public notification. These were among some 750 “oil field incidents” that had occurred in the state over the same time period, also without public notification. Until the AP inquiry, industry and state officials had kept quiet about one particular “massive spill” that had been accidentally discovered by a wheat farmer. Even small spills can contaminate water sources permanently and take cropland out of production.<sup>425</sup>
- November 26, 2013 – A USGS report found serious impacts of fracking on watersheds and water quality throughout the Appalachian Basin, as well as issues with radiation and seismic events. As noted in the report, the knowledge of how extraction affects water resources has not kept pace with the technology.<sup>426, 427</sup> Meanwhile, clean fresh water is becoming an increasingly scant resource. A report prepared for the U.S. State Department forecasts a serious freshwater shortage by 2030, with global demand exceeding supply by 40 percent.<sup>428</sup>
- November 22, 2013 – A USGS study of pollution from oil production in North Dakota, where horizontal drilling and hydraulic fracturing are heavily used, identified two potential plumes of groundwater contamination covering 12 square miles. The cause was traced to a casing failure in a wastewater disposal well. Drilling companies had incorrectly assumed that, once injected underground, the wastewater would remain contained. According to *EnergyWire*, the development of the Bakken oil formation is

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<sup>424</sup> Hirst, C., & Fuquay, J. (2013, December 7). Second leak reported at east Fort Worth gas well site. *Star-Telegram*. Retrieved from <http://www.star-telegram.com/2013/12/07/5399740/second-leak-reported-at-east-fort.html?rh=1>

<sup>425</sup> MacPherson, J. (2013, October 28). Nearly 300 pipeline spills in North Dakota have gone unreported to the public since January 2012. *Huffington Post*. Retrieved from [http://www.huffingtonpost.com/2013/10/28/pipeline-spills-north-dakota\\_n\\_4170133.html?ncid=edlinkusaolp00000003](http://www.huffingtonpost.com/2013/10/28/pipeline-spills-north-dakota_n_4170133.html?ncid=edlinkusaolp00000003)

<sup>426</sup> Kappel, W. M., Williams, J. H., & Szabo, Z. (2013). Water resources and shale gas/oil production in the Appalachian Basin - Critical issues and evolving developments. *U.S. Geological Survey*. Retrieved from <http://pubs.usgs.gov/of/2013/1137/pdf/ofr2013-1137.pdf>

<sup>427</sup> Mall, A. (2013, November 26). New USGS analysis: Threats to water, wildlife, and health from oil and gas development in the Appalachian basin [Web log post]. Retrieved from [http://switchboard.nrdc.org/blogs/asmall/new\\_usgs\\_analysis.html](http://switchboard.nrdc.org/blogs/asmall/new_usgs_analysis.html)

<sup>428</sup> National Intelligence Council. (2012, February 2). *Global Water Security: Intelligence Community Assessment*, (ICA 2012-08). Retrieved from [http://www.dni.gov/files/documents/Special%20Report\\_ICA%20Global%20Water%20Security.pdf](http://www.dni.gov/files/documents/Special%20Report_ICA%20Global%20Water%20Security.pdf)

“leaving behind an imprint on the land as distinct as the ones left by the receding ice sheets of the ice age.”<sup>429</sup>

- September 10, 2013 – Pennsylvania Attorney General Kathleen Kane filed criminal charges against Exxon Mobil Corporation’s subsidiary, XTO Energy Corporation, for a spill of 50,000 gallons of toxic drilling wastewater in 2010 that contaminated a spring and a tributary of the Susquehanna River. In July, XTO settled civil charges for the incident without admitting liability by agreeing to pay a \$100,000 fine and improve its wastewater management.<sup>430</sup>
- September 10, 2013 – Out of concern for risks posed to drinking water in the nation’s capital, George Hawkins, General Manager of DC Water, Washington, DC’s local water provider, called for a prohibition on horizontal drilling and hydraulic fracturing in the George Washington National Forest until the process can be proven safe.<sup>431</sup> The Potomac River is the source of the District’s water supply and has its headwaters in the George Washington National Forest, which sits atop the Marcellus Shale. The general managers of Fairfax Water, provider of drinking water for Fairfax County, Virginia, and the U.S. Army Corps of Engineers have called for a similar prohibition.<sup>432</sup>
- September 3, 2013 – The North Dakota Department of Mineral Resources voiced concern about an increasing number of fracking well blowouts (23 incidents in the past year) that result in spills and public safety threats.<sup>433</sup>
- August 28, 2013 – A joint USGS and U.S. Fish and Wildlife Service study documented a causal link between a fracking wastewater spill and the widespread death of fish in the Acorn Fork, a creek in Kentucky.<sup>434</sup>
- July 25, 2013 – A University of Texas at Arlington study of drinking water found elevated levels of arsenic and other heavy metals in some samples from private drinking

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<sup>429</sup> Vaidyanathan, G. (2013, November 22). Bakken shale: As oil production sets in, pollution starts to migrate -- scientists. *E&E Publishing, LLC*. Retrieved from <http://www.eenews.net/stories/1059990892>

<sup>430</sup> Maykuth, A. (2013, September 13). Shale criminal charges stun drilling industry. *Philly.com*. Retrieved from [http://articles.philly.com/2013-09-13/news/42012429\\_1\\_xto-energy-inc-criminal-charges-attorney-general](http://articles.philly.com/2013-09-13/news/42012429_1_xto-energy-inc-criminal-charges-attorney-general)

<sup>431</sup> Letter from George Hawkins, General Manager, DC Water, to U.S. Secretary of Agriculture, Thomas Vilsack, (Sept. 10, 2013), <http://www.washingtoncitypaper.com/blogs/housingcomplex/2013/09/20/dc-water-chief-urges-agriculture-secretary-not-to-allow-fracking-near-d-c/>

<sup>432</sup> Wiener, A. (2013, September 20). DC Water Chief urges Agriculture Secretary not to allow fracking near D.C. *Washington City Paper*. Retrieved from <http://www.washingtoncitypaper.com/blogs/housingcomplex/2013/09/20/dc-water-chief-urges-agriculture-secretary-not-to-allow-fracking-near-d-c/>

<sup>433</sup> Sun Staff. (2013, September 3). More blowouts a concern for N.D. *The Jamestown Sun*. Retrieved from <http://www.jamestownsun.com/content/more-blowouts-concern-nd>

<sup>434</sup> Papoulias, D., & MacKenzie, T. (2013, August 28). Hydraulic fracturing fluids likely harmed threatened Kentucky fish species. *USGS Newsroom*. Retrieved from <http://www.usgs.gov/newsroom/article.asp?ID=3677>

water wells located within five kilometers of active natural gas wells in the Barnett Shale.<sup>435</sup>

- July 3, 2013 – *ProPublica* reported that the EPA was wrong to have halted its investigation of water contamination in Wyoming, Texas and Pennsylvania—where high levels of benzene, methane, arsenic, oil, methane, copper, vanadium, and other chemicals associated with fracking operations have been documented.<sup>436</sup> Although numerous organizations and health professionals around the country have since called on the agency to resume its investigation, no action has been taken.
- June 6, 2013 – Reviewing hundreds of regulatory and legal filings, *Bloomberg News* reported that drillers have offered out-of-court cash settlements and property buyouts to homeowners who claim that fracking ruined their water. These agreements typically come with gag orders and sealed records. This strategy, the investigation noted, allows the industry to continue claiming that no cases of water contamination due to fracking have ever been confirmed, impedes public health research, and shields data from regulators, policy makers, and the new media.<sup>437</sup> The EPA also long ago noted how non-disclosure agreements between oil and gas operators and landowners challenge scientific progress and keep examples of drilling harm secret from the public. In a 1987 report, the EPA wrote, “In some cases, even the records of well-publicized damage incidents are almost entirely unavailable for review. In addition to concealing the nature and size of any settlement entered into between the parties, impoundment curtails access to scientific and administrative documentation of the incident.”<sup>438</sup>
- June 3, 2013 – A study by Duke University researchers linked fracking with elevated levels of methane, ethane, and propane in nearby groundwater.<sup>439</sup> Published in *Proceedings of the National Academy of Sciences*, the study included results from 141 northeastern Pennsylvania water wells. Methane levels were, on average, six times higher in drinking water wells closer to drilling sites when compared with those farther away, while ethane was 23 times higher.<sup>440</sup>

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<sup>435</sup> Fontenot, B. E., Hunt, L. R., Hildenbrand, Z. L., Carlton Jr., D. D., Oka, H., Walton, J. L., . . . Schug, K. A. (2013). An evaluation of water quality in private drinking water wells near natural gas extraction sites in the Barnett Shale formation. *Environmental Science & Technology*, 47(17), 10032-10040. doi: 10.1021/es4011724

<sup>436</sup> Lustgarten, A. (2013, July 3). EPA’s abandoned Wyoming fracking study one retreat of many. *ProPublica*. Retrieved from <http://www.propublica.org/article/epas-abandoned-wyoming-fracking-study-one-retreat-of-many>

<sup>437</sup> Efstathiou, J., Jr., & Drajem, M. (2013, June 5). Drillers silence fracking claims with sealed settlements. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2013-06-06/drillers-silence-fracking-claims-with-sealed-settlements.html>

<sup>438</sup> Environmental Protection Agency. (1987). *Report to Congress: Management of wastes from the exploration, development, and production of crude oil, natural gas, and geothermal energy* (Rep.). 137-138. Washington, D.C.: U.S. Environmental Protection Agency.

<sup>439</sup> Jackson, R. B., Vengosh, A., Darrah, T. H., Warner, N. R., Down, A., Poreda, R. J., . . . Karr, J. D. (2013). Increased stray gas abundance in a subset of drinking water wells near Marcellus shale gas extraction. *Proceedings of the National Academy of Sciences*, 110(28), 11250-11255. doi: 10.1073/pnas.1221635110

<sup>440</sup> CBS/AP. (2013, June 25). Methane found in Pa. drinking water near fracked wells. *CBS News*. Retrieved from <http://www.cbsnews.com/news/methane-found-in-pa-drinking-water-near-fracked-wells/>

- May 19, 2013 – In Pennsylvania, the *Scranton Times-Tribune* released details of an investigation that revealed at least 161 cases of water contamination from fracking between 2008 and the fall of 2012, according to state Department of Environmental Protection records.<sup>441</sup>
- April 2013 – Researchers analyzing publicly available Colorado data found 77 surface spills impacting groundwater in Weld County alone. Samples of these spills often exceeded drinking water maximum contaminant levels (MCLs) for benzene, toluene, ethylbenzene and xylene; for benzene, a known carcinogen, 90 percent of the samples exceeded the legal limit.<sup>442</sup>
- March 4, 2013 – Researchers at the University of Pittsburgh Graduate School of Public Health analyzed samples of gas drilling wastewater discharged to surface water through wastewater treatment plants. Barium, strontium, bromides, chlorides, and benzene all exceeded levels known to cause human health impacts.<sup>443</sup>
- December 9, 2012 – State data in Colorado showed more than 350 instances of groundwater contamination resulting from more than 2,000 spills from oil and gas operations over the past five years. Further, as the *Denver Post* reported, “Contamination of groundwater—along with air emissions, truck traffic and changed landscapes—has spurred public concerns about drilling along Colorado’s Front Range.”<sup>444</sup>
- May 4, 2012 – A report for the Canadian Government, released under the Access to Information Act, reviewed the process, the regulatory framework globally, and the potential health hazards related to shale gas extraction. Additionally, the report evaluated mechanisms for potential impacts and summarized the data knowledge and data gaps. Regarding water contamination, the report determined, “Although quantitative data are lacking, the qualitative data available indicate that potential contamination of water related to the shale gas industry may present hazard to the public health, especially for local population.” Regarding air contamination: “air emissions related to the shale gas industry present health hazards since the air pollutants originating from the vehicles and engines fuelled by diesel are toxic to the respiratory and cardiovascular systems and can cause premature mortality, volatile organic compounds have been associated to neurotoxicity and some of these compounds (e.g. benzene) as well as NORMs are known or possible human carcinogens.” The report concluded, “Any step of shale gas

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<sup>441</sup> Legere, L. (2013, May 19). Sunday Times review of DEP drilling records reveals water damage, murky testing methods. *The Times-Tribune*. Retrieved from <http://thetimes-tribune.com/news/sunday-times-review-of-dep-drilling-records-reveals-water-damage-murky-testing-methods-1.1491547>

<sup>442</sup> Gross, S. A., Avens, H. J., Banducci, A. M., Sahmel, J., Panko, J. M., & Tvermoes, B. E. (2013). Analysis of BTEX groundwater concentrations from surface spills associated with hydraulic fracturing operations. *Journal of the Air & Waste Management Association*, 63(4), 424-432. doi: 10.1080/10962247.2012.759166

<sup>443</sup> Ferrar, K. J., Michanowicz, D. R., Christen, C. L., Mulcahy, N., Malone, S. L., & Sharma, R. K. (2013). Assessment of effluent contaminants from three facilities discharging Marcellus shale wastewater to surface waters in Pennsylvania. *Environmental Science & Technology*, 47(7), 3472-3481. doi: 10.1021/es301411q

<sup>444</sup> Finley, B. (2012, December 9). Drilling spills reaching Colorado groundwater; state mulls test rules. *The Denver Post*. Retrieved from [http://www.denverpost.com/environment/ci\\_22154751/drilling-spills-reaching-colorado-groundwater-state-mulls-test#ixzz2EihHU2fg](http://www.denverpost.com/environment/ci_22154751/drilling-spills-reaching-colorado-groundwater-state-mulls-test#ixzz2EihHU2fg)



exploration/exploitation may represent a potential source of drinking water and air contamination; Hydraulic fracturing and wastewater disposal were identified as the main potential sources of risk.”<sup>445</sup>

- May 2012 – A report by researchers at Natural Resources Defense Council and Carnegie Mellon University found that the options available for dealing with fracking wastewater are inadequate to protect public health and the environment, resulting in increasing quantities of toxic wastewater as an ongoing problem without a good solution.<sup>446</sup>
- January 11, 2012 – The USGS reported that the Marcellus Shale is already highly fractured and that numerous fissures naturally occurring within the formation could potentially provide pathways for contaminants to migrate vertically into water supplies.<sup>447</sup>
- October 25, 2011 – After receiving new information from two companies, members of Congress updated their findings to show that “between 2005 and 2009, oil and gas service companies injected 32.7 million gallons of diesel fuel or hydraulic fracturing fluids containing diesel fuel in wells in 20 states.”<sup>448</sup>
- October 17, 2011 – Thomas P. Jacobus, General Manager of the U.S. Army Corps of Engineers’ Washington Aqueduct, called for a prohibition on horizontal hydraulic fracturing in the George Washington National Forest because of concern that fracking poses risks to drinking water. The Washington Aqueduct—which provides drinking water to Washington, DC, Arlington County, Virginia, and Falls Church, Virginia—is supplied by the Potomac River, which has its headwaters in the George Washington National Forest that sits atop the Marcellus Shale. Jacobus said, “Enough study on the technique [hydraulic fracturing] has been published to give us great cause for concern about the potential for degradation of the quality of our raw water supply....”<sup>449</sup>
- October 11, 2011 – Charles M. Murray, General Manager of Fairfax Water, called for a prohibition on horizontal hydraulic fracturing in the George Washington National Forest. “Natural gas development activities have the potential to impact the quantity and quality

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<sup>445</sup> Louis, S. (2012, May 4). Potential health hazards from shale gas exploration and exploitation—Drinking water and ambient air. Presented to Health Canada by SANEXEN Environmental Services; 0/Ref.: RA11-410. Document released under the (Canadian) Access to Information Act.

<sup>446</sup> Hammer, R., & VanBriesen, J. (2012, May). *In fracking’s wake: New rules are needed to protect our health and environment from contaminated wastewater* (Rep.). Natural Resources Defense Council. Retrieved from <http://www.nrdc.org/energy/files/fracking-wastewater-fullreport.pdf>

<sup>447</sup> U.S. Geological Survey, New York Water Science Center. (2012, January 11). *Comments on the revised draft supplemental generic environmental impact statement*. (Rep.). Retrieved from [http://www.ewg.org/sites/default/files/report/ReviseddraftSGEIS\\_USGScomments\\_Version3\\_0.pdf](http://www.ewg.org/sites/default/files/report/ReviseddraftSGEIS_USGScomments_Version3_0.pdf)

<sup>448</sup> Waxman, H. A., Markey, E. J., & DeGette, D. (2011, October 25). *Committee on Energy & Commerce* (U.S.A., Congress, Committee on Energy & Commerce). Retrieved from <http://democrats.energycommerce.house.gov/index.php?q=news/rep-waxman-markey-and-degette-report-updated-hydraulic-fracturing-statistics-to-epa>

<sup>449</sup> Jacobus, T. P. (2012, April 25). Draft environmental impact statement for the George Washington National Forest [Letter written October 17, 2011 to K. Landgraf]. Retrieved, from [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5366331.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5366331.pdf)

of Fairfax Water's source water," Murray wrote. "Downstream water users and consumers will bear the economic burden if drinking water sources are contaminated or the quality of our source water supply is degraded."<sup>450</sup> Fairfax Water provides drinking water for Fairfax County in Virginia.

- September 7, 2011 – In its draft Supplemental Generic Environmental Impact Statement (SGEIS), the New York State Department of Environmental Conservation (NYS DEC) acknowledged that "there is questionable available capacity"<sup>451</sup> for New York's public sewage treatment plants to accept drilling wastewater, yet the agency said that it would allow those facilities to accept such waste if the plants meet permitting conditions.<sup>452</sup> The NYS DEC proposed underground injection as one alternative to sewage treatment procession of fracking waste. Although it is a common method of disposal for fracking wastewater,<sup>453</sup> the last significant government study of pollution risks from oil and gas wastewater injection wells occurred in 1989 and found multiple cases of costly groundwater contamination.<sup>454</sup> In subsequent years, studies have continued to link underground injection of drilling wastewater to pollution as well as earthquakes.<sup>455</sup>
- September 2011 – A team led by Theo Colburn of the Endocrine Disruptor Exchange found that 25 percent of chemicals known to be used in fracking fluids are implicated in cancer, 37 percent could disrupt the endocrine system, and 40-50 percent could cause nervous, immune and cardiovascular system problems. The research team also found that more than 75 percent could affect the skin, eyes, and respiratory system, resulting in various problems such as skin and eye irritation or flu-like symptoms.<sup>456</sup>
- August 4, 2011 – As reported by the *New York Times*, the EPA had alerted Congress in 1987 about a case of water contamination caused by fracking. Its report documented that

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<sup>450</sup> Murray, C. M. (n.d.). Draft environmental impact statement for the George Washington National Forest [Letter written October 11, 2013 to K. Landgraf]. Retrieved from <http://www.svnva.org/wp-content/uploads/fairfax-wash-aqueduct-gwnf-comments.pdf>

<sup>451</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (6-62, Rep.).

<sup>452</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (6-57 through 6-63, Rep.).

<sup>453</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (6-64, Rep.).

<sup>454</sup> United States Government Accountability Office. (1989, July 5). Drinking water: Safeguards are not preventing contamination from injected oil and gas wastes. Retrieved from <http://www.gao.gov/products/RCED-89-97>

<sup>455</sup> Fountain, H. (2012, January 1). Disposal halted at well after new quake in Ohio. *The New York Times*. Retrieved from <http://www.nytimes.com/2012/01/02/science/earth/youngstown-injection-well-stays-shut-after-earthquake.html>

<sup>456</sup> Colborn, T., Kwiatkowski, C., Schultz, K., & Bachran, M. (2011). Natural gas operations from a public health perspective. *Human and Ecological Risk Assessment: An International Journal*, 17(5), 1039-1056. doi: 10.1080/10807039.2011.605662

a shale gas well hydraulically fractured at a depth of more than 4,200 feet contaminated a water supply only 400 feet from the surface.<sup>457, 458, 459</sup>

- May 17, 2011 – The state of Pennsylvania fined Chesapeake Energy Corporation \$900,000 for an incident in which improper cementing and casing in one of the company's gas wells allowed methane to migrate underground and contaminate 16 private drinking water wells in Bradford County.<sup>460</sup>
- May 17, 2011 – A Duke University study documented “systematic evidence for methane contamination of drinking water associated with shale gas extraction.”<sup>461</sup> The study showed that methane levels were 17 times higher in water wells near drilling sites than in water wells in areas without active drilling.<sup>462</sup>
- April 22, 2011 – Describing one of many blowouts, the Associated Press reported on a shale gas well in Canton, Pennsylvania that spewed thousands of gallons of chemical-laced water on farmland and into a stream for two consecutive days before being brought under control.<sup>463</sup>
- April 18, 2011 – As part of a year-long investigation into hydraulic fracturing and its potential impact on water quality, U.S. Representatives Henry Waxman (D-Calif.), Edward Markey (D-Mass.) and Diana DeGette (D-Colo.) released the second of two reports issued in 2011. Their analysis of hydraulic fracturing fluids used by the 14 leading oil and natural gas service companies between 2005 and 2009 found, among other things, that the companies used more than 650 different products that contained chemicals that are known or possible human carcinogens, regulated under the Safe Drinking Water Act, or listed as hazardous air pollutants under the Clean Air Act. The report also showed that “between 2005 and 2009, 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 most cases the companies stated that they did not have access to proprietary information about products they purchased ‘off the shelf’ from chemical suppliers. In these cases, the companies are injecting fluids containing

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<sup>457</sup> Urbina, I. (2011, August 4). A tainted water well, and concern there may be more. Retrieved from <http://www.nytimes.com/2011/08/04/us/04natgas.html>

<sup>458</sup> U.S. Environmental Protection Agency. (1987). *Report to Congress: Management of wastes from the exploration, development, and production of crude oil, natural gas, and geothermal energy* (Rep.). 4-22, 4-23. Retrieved from <http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=20012D4P.PDF>

<sup>459</sup> Horwitt, D. (2011, August 3). Cracks in the facade. *Environmental Working Group*. Retrieved from <http://www.ewg.org/research/cracks-facade>

<sup>460</sup> Levy, M. (2011, May 18). DEP fines Chesapeake \$1 million. *Pressconnects.com*. Retrieved from <http://www.pressconnects.com/viewart/20110517/NEWS01/105170345/DEP-fines-Chesapeake-1-million>

<sup>461</sup> Osborn, S. G., Vengosh, A., Warner, N. R., & Jackson, R. B. (2011). Methane contamination of drinking water accompanying gas-well drilling and hydraulic fracturing. *Proceedings of the National Academy of Sciences*, 108, 8172-8176. doi: 10.1073/pnas.1100682108

<sup>462</sup> Duke University. (2011). Methane levels 17 times higher in water wells near hydrofracking sites, study finds. *ScienceDaily*. Retrieved from <http://www.sciencedaily.com/releases/2011/05/110509151234.htm>

<sup>463</sup> The Associated Press. (2011, April 22). Crews stop flow of drilling fluid from Pennsylvania well. *Syracuse.com*. Retrieved from [http://www.syracuse.com/news/index.ssf/2011/04/crews\\_stop\\_flow\\_of\\_drilling\\_fl.html](http://www.syracuse.com/news/index.ssf/2011/04/crews_stop_flow_of_drilling_fl.html)

chemicals that they themselves cannot identify.”<sup>464</sup> These findings were reported in the *New York Times*.<sup>465</sup>

- January 2011 – A team of scientists led by a University of Central Arkansas researcher called attention to the threat posed to surface waters by rapidly expanding shale gas development, noting a lack of data collection accompanying the rush to drill. “Gas wells are often close to surface waters that could be impacted by elevated sediment runoff from pipelines and roads, alteration of stream flow as a result of water extraction, and contamination from introduced chemicals or the resulting wastewater.”<sup>466</sup>
- January 31, 2011 – As part of a year-long investigation into hydraulic fracturing and its potential impact on water quality, U.S. Representatives Henry Waxman (D-Calif.), Edward Markey (D-Mass.) and Diana DeGette (D-Colo.) reported that “between 2005 and 2009, oil and gas service companies injected 32.2 million gallons of diesel fuel or hydraulic fracturing fluids containing diesel fuel in wells in 19 states.” Furthermore, revealing apparent widespread violation of the Safe Drinking Water Act, the investigation found that no oil and gas service companies had sought—and no state or federal regulators had issued—permits for the use of diesel fuel in hydraulic fracturing.<sup>467</sup>
- April 29, 2010 – In 2010, the Colorado Oil and Gas Conservation Commission fined Occidental Petroleum Corporation (OXY) USA a record \$390,000 for an incident of pollution, discovered in 2008, when its drilling wastes leaked through an unlined pit, contaminated two springs with benzene, and polluted other nearby water sources. In addition, the regulators separately fined OXY USA \$257,400 for a nearby case of pollution, also discovered in 2008, in which a torn liner in a pit caused drilling waste fluids to leak out and contaminate two springs with benzene.<sup>468</sup>
- June 5, 2009 – A leaking pipe carrying fracking waste in Washington County, Pennsylvania, polluted a tributary of Cross Creek Lake, killing fish, salamanders, crayfish, and aquatic insect life in approximately three-quarters of a mile of the stream.<sup>469</sup>

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<sup>464</sup> Waxman, H. A., Markey, E. J., & DeGette, D. (2011, April 18). Committee on Energy & Commerce (U.S.A., Congress, Committee on Energy & Commerce). Retrieved from <http://democrats.energycommerce.house.gov/sites/default/files/documents/Hydraulic-Fracturing-Chemicals-2011-4-18.pdf>

<sup>465</sup> Urbina, I. (2011, April 17). Chemicals were injected into wells, report says. *The New York Times*. Retrieved from <http://www.nytimes.com/2011/04/17/science/earth/17gas.html>

<sup>466</sup> Entekin, S., Evans-White, M., Johnson, B., & Hagenbuch, E. (2011). Rapid expansion of natural gas development poses a threat to surface waters. *Frontiers in Ecology and the Environment*, 9(9), 503-511. doi: 10.1890/110053

<sup>467</sup> Waxman, H. A., Markey, E. J., & DeGette, D. (2011, January 31). Committee on Energy & Commerce (U.S.A., Congress, Committee on Energy & Commerce). Retrieved from <http://democrats.energycommerce.house.gov/index.php?q=news/waxman-markey-and-degette-investigation-finds-continued-use-of-diesel-in-hydraulic-fracturing-f>

<sup>468</sup> Webb, D. (2010, April 29). Record fine, second one against Oxy approved. *Grand Junction Sentinel*. Retrieved from <http://www.gjsentinel.com/news/articles/record-fine-second-one-against-oxy-approved>

<sup>469</sup> Pittsburgh Post-Gazette. (2009, June 5). Waste from Marcellus shale drilling in Cross Creek Park kills fish. *Pittsburgh Post-Gazette*. Retrieved, from <http://www.post-gazette.com/washington/2009/06/05/Waste-from-Marcellus-shale-drilling-in-Cross-Creek-Park-kills-fish/stories/200906050136>

- April 26, 2009 – Officials in three states linked water contamination and methane leaks to gas drilling. Incidents included a case in Ohio where a house exploded after gas seeped into its water well and multiple cases of exploding drinking water wells in Dimock, Pennsylvania.<sup>470</sup>
- November 13, 2008 – *ProPublica* reported more than 1,000 cases of drilling-related contamination documented by courts and state and local governments in Colorado, New Mexico, Alabama, Ohio, and Pennsylvania.<sup>471</sup>
- December 15, 2007 – In Bainbridge, Ohio, a gas well that was improperly cemented and subsequently fractured by Ohio Valley Energy Systems Corporation allowed natural gas to migrate outside of the well, causing a home to explode. In addition, 23 nearby water wells were contaminated, two of which were located more than 2,300 feet from the drilling site.<sup>472, 473, 474</sup>

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<sup>470</sup> Lustgarten, A. (2009, April 26). Officials in three states pin water woes on gas drilling. *ProPublica*. Retrieved from <http://www.propublica.org/article/officials-in-three-states-pin-water-woes-on-gas-drilling-426>

<sup>471</sup> Lustgarten, A. (2008, November 13). Buried secrets: Is natural gas drilling endangering U.S. water supplies? *ProPublica*. Retrieved from <http://www.propublica.org/article/buried-secrets-is-natural-gas-drilling-endangering-us-water-supplies-1113>

<sup>472</sup> Ohio Department of Natural Resources Division of Mineral Resources Management. (2008, September 1). *Report on the investigation of the natural gas invasion of aquifers in Bainbridge Township of Geauga County, Ohio*. (Rep.). Retrieved from <http://www.ohiodnr.com/mineral/bainbridge/tabid/20484/default.aspx>

<sup>473</sup> Bair, E. S., Freeman, D. C., & Senko, J. M. (2010, June). *Expert panel technical report, subsurface gas invasion Bainbridge Township, Geauga County, Ohio* (Rep.). Retrieved from <http://oilandgas.ohiodnr.gov/portals/oilgas/pdf/bainbridge/DMRM%2000%20Title%20Page,%20Preface,%20Acknowledgements.pdf>

<sup>474</sup> Ohio Department of Natural Resources, Order Number 2009-17 (Apr. 14, 2009) (see attachments A, B).

## Inherent engineering problems that worsen with time

*Studies show that many oil and gas wells leak, allowing for the migration of natural gas and potentially other substances into groundwater and/or the atmosphere. About five percent of wells leak immediately, 50 percent leak after 15 years, and 60 percent leak after 30 years. The act of fracking itself can redistribute stress and create underground pathways for fluid migration, which, in turn, can communicate with pathways caused by deterioration of cement in aging well casings, leading to both groundwater contamination and atmospheric emissions.*

*The problem of leaking wells, first identified by industry, has no known solution. Data from Pennsylvania's Department of Environmental Protection (DEP) agree, showing over nine percent of shale gas wells drilled in the state's northeastern counties leaking within the first five years. Leaks pose serious risks, including potential loss of life or property from explosions and migration of gas and other harmful chemicals into drinking water supplies. Methane leaking into aquifers can, under some conditions, be transformed by bacteria into hydrogen sulfide and other poisonous byproducts. Microbes from deep shale formations can likewise generate sulfides contributing, over time, to corrosion of pipes and casings.*

*There is no evidence to suggest that the problem of cement and well casing impairment is abating. Industry has no solution for rectifying the chronic problem of well casing/cement failures and resulting leakage. Plugging old, inactive wells is an imperfect solution because, as research shows, the cement plugs themselves degrade over time and because many wells leak from outside the well casing.*

- April 19, 2018 – As part of a major review, a University of Aberdeen team of researchers assessed the various underground pathways by which fracking creates methane leaks and concluded that aging well casings are a leading cause of methane leaks from drilling and fracking operations. While the intersection of fracture propagation with naturally present geological faults in the subsurface is another potential route for methane leakage, the more important route is the intersection of fracture propagation with other wells with old cement. “The major sources of methane leakage related to shale gas activities are the intersections of hydraulic fractures with abandoned oil and gas wells which have a reduced mechanical well integrity due to cement degradation. As a result, the stress redistributions caused by hydraulic fracturing and the deterioration of cement in abandoned wells with age allow migration pathways to be created easily, leading to both groundwater contamination and atmospheric emissions.” Plugging wells is an imperfect solution because the cement commonly used for this process itself degrades with time, especially in the presence of carbon dioxide. “No concrete method [has been] established for the methane leakage mitigation from shale gas wells.”<sup>475</sup>

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<sup>475</sup> Yudhowijoyo, A., Rafati, R., Haddad, A. S., Raja, M. S., & Hamidi, H. (2018). Subsurface methane leakage in unconventional shale gas reservoirs: A review of leakage pathways and current sealing techniques. *Journal of Natural Gas Science and Engineering*, 54, 309-319. doi: 10.1016/j.jngse.2018.04.013

- November 23, 2017 – An investigative journalist from *The Tyee* in Vancouver obtained a copy of a 2013 report from British Columbia’s Oil and Gas Commission warning about hundreds of uncontrolled methane leaks from shale gas wells located in the northern Rocky Mountain range near Fort Nelson. The commission’s report, never shared with the public or with elected officials, remained an internal document until it was uncovered by the newspaper. Cornell University engineer Anthony Ingraffea, quoted in the story, said the report’s findings served as another confirmation that wells leak badly and inevitably over time. “What do they expect from underground operations such as these, total obedience to design intent? Why are operators and regulators around the world seemingly surprised when things go wrong underground, and in so many ways, and so often?” Ingraffea said.<sup>476, 477</sup>
- July 5, 2017 – A team of researchers led by microbiologists from Ohio State University investigated bacteria from hydraulically fractured shale by sampling fracking wastewater from a well drilled in the Utica shale. The dominant microorganism was a bacterium that generates sulfides, which can contribute to corrosion of well casings. “The impact of microbial metabolism within these environments is poorly understood. . . . These findings emphasize the potential detrimental effects that could arise from thiosulfate-reducing microorganisms in hydraulically fractured shales, which are undetected by current industry-wide corrosion diagnostics.”<sup>478</sup>
- April 1, 2017 – The rapid depletion of fracked wells requires drilling ever more wells to keep up with production. As time goes by, wells become more densely packed into a drilling section. Decreasing distances between wells increases the risk of inter-well communication, which occurs when the pumping of fracking fluid into one well affects a nearby well. According to an analysis in the *Journal of Petroleum Technology*, these so called “frack hits” are unpredictable, uncontrolled, and can be violent, damaging tubing, casings, and well integrity. In some cases, frack hits involve blowouts of fracking fluid. The industry has no solution for this increasingly common problem.<sup>479</sup> Indeed, as a sequel report describes, operators use frack hits as a tool for revealing how tightly wells can be spaced in a drilling section to maximize extraction—even while acknowledging inherent safety risks. A drilling section with no frack hits at all is presumed to lack sufficient well density for optimal “economic recovery.”<sup>480</sup>
- July 9, 2015 – As part of a larger examination of the potential health and environmental impacts of fracking in California, the California Council on Science and Technology

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<sup>476</sup> Nikiforuk, A. (2017, November 23). Despite what politicians say, hundreds of BC gas wells leak methane. *The Tyee*. Retrieved from <https://thetyee.ca/News/2017/11/23/Hundreds-of-BC-Gas-Wells-Leak-Meth/>

<sup>477</sup> BC Oil and Gas Commission. (2013, December). *Gas migration preliminary investigation report*. Retrieved from <https://www.bcogc.ca/node/14620/download>

<sup>478</sup> Booker, A. E., Borton, M. A., Daly, R. A., Welch, S. A., Nicora C. D., Hoyt, D. W., . . . Wilkins, M. J. (2017). Sulfide generation by dominant Halanaerobium microorganisms in hydraulically fractured shales. *mSphere*, 2(4), e00257-17. doi: 10.1128/mSphereDirect.00257-17

<sup>479</sup> Jacobs, T. (2017, April 1). Oil and gas producers find frac hits in shale wells a major challenge. *Journal of Petroleum Technology*. Retrieved from <https://www.spe.org/en/jpt/jpt-article-detail/?art=2819>

<sup>480</sup> Jacobs, T. (2017, November 1). Frac hits reveal well spacing may be too tight, completion volumes too large. *Journal of Petroleum Technology*. Retrieved from <https://www.spe.org/en/jpt/jpt-article-detail/?art=3510>

(CCST) documented cases of well failures triggered by underground movements that caused well casings to shear. Sheared well casings can allow gas and fluids from the fracking zone to migrate to overlying aquifers. The CCST team identified several mechanisms by which casing shears can occur in California as oil wells age: surface subsidence, heaving, reservoir compaction, and earthquakes. Prolonged drought can also damage the integrity of well casings: as groundwater levels fall, landforms can sink and contribute to casing shear.<sup>481</sup>

- June 30, 2015 – According to the New York State Department of Environmental Conservation (NYS DEC) Findings Statement, “there is a risk that well integrity can fail, especially over time, and questions have arisen about whether high-volume hydraulic fracturing can cause seismic changes which could potentially result in fracturing fluid migration through abandoned wells or existing fissures and faults. Thus, high-volume hydraulic fracturing could result in significant adverse impacts to water resources from well construction and fracturing fluid migration.”<sup>482</sup>
- June 4, 2015 – As part of a draft assessment of fracking’s impact on drinking water, the U.S. Environmental Protection Agency (EPA) examined cases of water contamination across the United States and concluded that “construction issues, sustained casing pressure, and the presence of natural faults and fractures can work together to create pathways for fluids to migrate toward drinking water resources.” Fracking older wells poses additional risks, the draft study notes, because aging itself “can contribute to casing degradation, which can be accelerated by exposure to corrosive chemicals, such as hydrogen sulfide, carbonic acid, and brines” and because many older wells were never designed to withstand the high pressures and stress of fracking operations. The EPA estimates that 6 percent of the 23,000 U.S. oil and gas wells (= 1,380 wells) first fracked in 2009 or 2010 were drilled more than ten years earlier.<sup>483</sup>
- December 2, 2014 – Problems with structural integrity have been documented in a well at the only hydraulically fractured site in the United Kingdom. Email messages obtained under freedom of information laws reveal that problems with wellbore integrity emerged in April of 2014 and attempts were made to remediate the problem, although nothing was reported at that time to regulators. The drilling company, Cuadrilla Resources, continues to deny that any problems exist with the well, emphasizing that “no leak of fluids” occurred and that “the issue” was resolved during the abandonment process. Cuadrilla

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<sup>481</sup> Stringfellow, W. T., Cooley H., Varadharajan, C., Heberger, M., Reagan, M. T., Domen, J.K., Sandelin, W. ... Houseworth, J. E. (2015, July 9). Volume II, Chapter 2: Impacts of well stimulation on water resources. In: *An Independent Scientific Assessment of Well Stimulation in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from <http://ccst.us/publications/2015/vol-II-chapter-2.pdf>

<sup>482</sup> New York State Department of Environmental Conservation. (2015, June 30). *Final supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program: Regulatory program for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus Shale and other low-permeability gas reservoirs, findings statement*. Retrieved from [http://www.dec.ny.gov/docs/materials\\_minerals\\_pdf/findingstatehvhf62015.pdf](http://www.dec.ny.gov/docs/materials_minerals_pdf/findingstatehvhf62015.pdf)

<sup>483</sup> U.S. Environmental Protection Agency (2015, June 30). *Assessment of the Potential Impacts of Hydraulic Fracturing for Oil and Gas on Drinking Water Resources*, executive summary (draft). Retrieved from [http://www2.epa.gov/sites/production/files/2015-06/documents/hf\\_es\\_erd\\_jun2015.pdf](http://www2.epa.gov/sites/production/files/2015-06/documents/hf_es_erd_jun2015.pdf)



had previously been reprimanded for failing to disclose a more minor deformation in the well casing. The well was abandoned at the end of last year, following two earthquakes in 2011, which scientists determined to have been caused by fracking at the site.<sup>484</sup>

- August 11, 2014 – Researchers affiliated with multiple universities and with the Los Alamos National Laboratory summarized recent field observations of wellbore-integrity failure, concluding that, because at least some well failures are not identified, reported barrier failure rates of 1-10 percent of wells and reported rates of groundwater contamination of 0.01-0.1 percent of wells constitute a “lower bound” for possible environmental problems. Citing hydraulic fracturing, as well as temperature and pressure changes, as operations that can induce pathways for leaks, the authors point out that few studies have considered the very-long-term fate (“>50 years”) of wellbore systems. They include “whether unconventional resource development alters the frequency of well integrity failures” as a critical topic for future research.<sup>485</sup>
- July 30, 2014 – Based on records obtained from Pennsylvania’s DEP, Scranton’s *Times-Tribune* reported that five natural gas wells in Bradford County have leaked methane for years because of persistent casing and cement problems. In the most recent violation, a PA-DEP inspector found combustible gas flowing through vents connected to the cement between layers of pipe. The agency issued a notice of violation for each well, saying combustible gas outside the well’s surface casing violates state regulations. Each of the wells has four layers of steel casing, but nothing prevents leaking (stray) methane from flowing into the atmosphere. No evidence of water contamination has yet been seen. None of the wells have produced any gas for sale.<sup>486</sup>
- June 30, 2014 – A study published in *Proceedings of the National Academy of Sciences* by a Cornell University research team projected that over 40 percent of shale gas wells in Northeastern Pennsylvania will leak methane into groundwater or the atmosphere over time. Analyzing more than 75,000 state inspections of more than 41,000 oil and gas wells in Pennsylvania since 2000, the researchers identified high occurrences of casing and cement impairments inside and outside the wells. A comparative analysis showed that newer, unconventional (horizontally fracked) shale gas wells were leaking at six times the rate of conventional (vertical) wells drilled over the same time period. The leak rate for unconventional wells drilled after 2009 was at least six percent, and rising with time. In the state’s northeastern counties between 2000 and 2012, over nine percent of shale gas wells drilled leaked within the first five years.<sup>487</sup> The study also discovered that over

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<sup>484</sup> Bryant, B. (2014, December 2). The only fracked site in the United Kingdom suffered structural failure. *Vice News*. Retrieved from <https://news.vice.com/article/the-only-fracking-site-in-the-united-kingdom-suffered-structural-failure>

<sup>485</sup> Jackson R. B., Vengosh, A., Carey, J. W., Davies, R. J., Darrah, T. H., O’Sullivan, F., & Pétron, G. (2014). The environmental costs and benefits of fracking. *Annual Review of Environment and Resources*, 39, 327–62. doi: 10.1146/annurev-environ-031113-144051

<sup>486</sup> Gibbons, B. (2014, July 30). Five gas wells leaked methane for years. *Times-Tribune*. Retrieved from <http://thetimes-tribune.com/news/five-gas-wells-leaked-methane-for-years-1.1727537>

<sup>487</sup> Ingraffea, A., Wells, M., Santoro, R., & Shonkoff, S. (2014). Assessment and risk analysis of casing and cement impairment in oil and gas wells in Pennsylvania, 2000–2012. *Proceedings of the National Academy of Sciences*. Retrieved from <http://www.pnas.org/content/early/2014/06/25/1323422111.abstract>

8,000 oil and gas wells drilled since 2000 had not received a facility-level inspection. This study helps explain the results of earlier studies that documented elevated levels of methane in drinking water aquifers located near drilling and fracking operations in Pennsylvania and points to compromised structural integrity of well casings and cement as a possible mechanism.

- May 22, 2014 – In a 69-page report, University of Waterloo researchers warned that natural gas seeping from 500,000 wellbores in Canada represents “a threat to environment and public safety” due to groundwater contamination, greenhouse gas emissions, and explosion risks wherever methane collects in unvented buildings and spaces. The report found that 10 percent of all active and suspended gas wells in British Columbia now leak methane. Additionally, the report found that some hydraulically fractured shale gas wells in that province have become “super methane emitters” that spew as much as 2,000 kilograms of methane a year.<sup>488, 489</sup>
- May 1, 2014 – Following a comprehensive review of evidence, the Council of Canadian Academies identified inherent problems with well integrity as one of its top concerns about unconventional drilling and fracking. According to one expert panel, “the greatest threat to groundwater is gas leakage from wells from which even existing best practices cannot assure long-term prevention.”<sup>490</sup> Regarding their concerns related to well integrity and cement issues, the panel wrote:

Two issues of particular concern to panel members are water resources, especially groundwater, and GHG emissions. Both related to well integrity.... Natural gas leakage from improperly formed, damaged, or deteriorated cement seals is a long-recognized yet unresolved problem .... Leaky wells due to improperly placed cement seals, damage from repeated fracturing treatments, or cement deterioration over time, have the potential to create pathways for contamination of groundwater resources and to increase GHG emissions.

They further explain:

Cement may crack, shrink, or become deformed over time, thereby reducing the tightness of the seal around the well and allowing the fluids and gases ... to escape into the annulus between casing and rock and thus to the surface.... The challenge of ensuring a tight cement seal [will] be greater for shale gas wells that are subjected to repeated pulses of high pressure during the hydraulic fracturing process than for conventional gas wells. This pressure stresses the casing and therefore the cement that isolates the well from surrounding formations

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<sup>488</sup> Dusseault, M. B., Jackson, R. E., & MacDonald, D. (2014, May 22). Towards a road map for mitigating the rates and occurrences of long-term wellbore leakage. Geofirma Engineering, Ltd. Retrieved from [http://geofirma.com/wp-content/uploads/2015/05/lwp-final-report\\_compressed.pdf](http://geofirma.com/wp-content/uploads/2015/05/lwp-final-report_compressed.pdf)

<sup>489</sup> Nikiforuk, A. (2014, June 5). Canada's 500,000 leaky energy wells: 'Threat to public' *The Tyee*. Retrieved from <http://www.thetyee.ca/News/2014/06/05/Canada-Leaky-Energy-Wells/>

<sup>490</sup> Council of Canadian Academies. (2014, May 1). *Environmental Impacts of Shale Gas Extraction in Canada: the Expert Panel on Harnessing Science and Technology to Understand the Environmental Impacts of Shale Gas Extraction*. Retrieved from <http://bit.ly/1nNicuf>

repeatedly.

- January 8, 2013 – According to state inspections of all 6,000 wells drilled in Pennsylvania’s Marcellus Shale before 2013, six to ten percent of them leaked natural gas, with the rate of leakage increasing over time. The rate was six percent in 2010 (97 well failures out of 1,609 wells drilled); 7.1 percent in 2011 (140 well failures out of 1,972 wells drilled); and 8.9 percent in 2012 (120 well failures out of 1,346 wells drilled).<sup>491</sup> These data include wells that were cited for leakage violations, and wells that were noted to be leaking by inspectors but which had not been given violations. The NYS DEC forecasts that 50,000 wells could be drilled over the life of the Marcellus Shale play. If they fail at the same rate as wells in Pennsylvania, 4,000 wells would fail and leak in New York almost immediately.<sup>492</sup>
- March 2009 – A study published by the Society of Petroleum Engineers of more than 315,000 oil, gas, and injection wells in Alberta, Canada, found that 4.5 percent of the wells had unintended gas flow to the surface. In one designated area, officials required testing for gas migration outside the well casings in addition to routine testing for gas leaks within the rings of steel casings (annuli). Within this special testing zone, 15.5 percent of wells (3,205 of 20,725) leaked gas, and the incidence of gas leaks was four times percent higher in horizontal or deviated wells than in vertical wells.<sup>493</sup>
- Autumn 2003 – Schlumberger, one of the world’s largest companies specializing in hydraulic fracturing and other oilfield services, reported in its in-house publication, *Oilfield Review*, that more than 40 percent of approximately 15,500 wells in the outer continental shelf area in the Gulf of Mexico were leaking gas. These included actively producing wells, in addition to shut-in and temporarily abandoned wells. In many cases, the gas leaked through the spaces (annuli) between layers of steel casing that drilling companies had injected with cement precisely to prevent such gas leaks. Leakage rates increased dramatically with age: about five percent of the wells leaked immediately; 50 percent were leaking after 15 years; and 60 percent were leaking after about 30 years.<sup>494</sup> Gas leaks pose serious risks including loss of life from explosions and migration of gas and associated contaminants into drinking water supplies. Leaks also allow the venting of raw methane into the atmosphere where it acts as a powerful greenhouse gas.
- November 2000 – Maurice Dusseault, a specialist in rock mechanics at the University of

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<sup>491</sup> Ingraffea, A. R. (2013). Some scientific failings within high volume hydraulic fracturing proposed regulations. Retrieved from

[http://www.psehealthyenergy.org/data/NYS\\_DEC\\_Proposed\\_REGS\\_comments\\_Ingraffea\\_Jan\\_2013.pdf](http://www.psehealthyenergy.org/data/NYS_DEC_Proposed_REGS_comments_Ingraffea_Jan_2013.pdf)

<sup>492</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (2-1, Rep.).

<sup>493</sup> Watson, T. L., & Bachu, S. (2009). Evaluation of the potential for gas and CO<sub>2</sub> leakage along wellbores, Society of Petroleum Engineers. *SPE Drilling & Completion*, 24, 115-126. doi: 10.21.18/106817-PA

<sup>494</sup> Brufatto, C. (2003). From mud to cement - Building gas wells. *Oilfield Review*, 15(3). Retrieved from [http://www.slb.com/resources/publications/industry\\_articles/oilfield\\_review/2003/or2003aut06\\_building\\_gas\\_wells.aspx](http://www.slb.com/resources/publications/industry_articles/oilfield_review/2003/or2003aut06_building_gas_wells.aspx)

Waterloo in Ontario, and two co-authors presented a paper published by the Society of Petroleum Engineers, in which they reported that oil and natural gas wells routinely leak gas through cracks in their cement casings, likely caused by cement shrinkage over time and exacerbated by upward pressure from natural gas. According to their paper, in Alberta, it is common for wells to leak natural gas into aquifers. “Because of the nature of the mechanism, the problem is unlikely to attenuate,” they wrote, “and the concentration of the gases in the shallow aquifers will increase with time.”<sup>495</sup>

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<sup>495</sup> Dusseault, M. B., Gray, M. N., & Nawrocki, P. A. (2000). Why oil wells leak: Cement behavior and long-term consequences. *Society of Petroleum Engineers*. Retrieved from <http://www.hydrorelief.org/frackdata/references/65704543-Casing-Leaks.pdf>

## Radioactive releases

*Exemptions from federal hazardous waste laws mean that no national regulatory framework exists for handling the radioactive materials in solid and liquid fracking waste. Instead, regulation is the responsibility of individual states, which vary widely in their approaches. High levels of radiation documented in fracking wastewater from many shale formations raise special concerns in terms of impacts to groundwater and surface water. Measurements of radium in fracking wastewater in New York and Pennsylvania, from the particularly radioactive Marcellus Shale, have been as high as 3,600 times the regulatory limit for drinking water, as established by the U.S. Environmental Protection Agency (EPA). Studies have found toxic levels of radiation in Pennsylvania waterways even after fracking wastewater was disposed of through an industrial wastewater treatment plant.*

*A study found high levels of radon in buildings located in heavily drilled areas of Pennsylvania, with levels of radon rising since the start of the fracking boom. Unsafe levels of radon and its decay products in natural gas produced from the Marcellus Shale may also contaminate pipelines and compressor stations, as well as pose risks to end-users when allowed to travel into homes. Increasing evidence documents illegal, haphazard dumping of radioactive fracking waste, along with its disposal in municipal landfills not engineered to contain radioactivity. Drill cuttings—the pulverized rock pulled up during the drilling process—are a special concern as this form of solid waste, generated in prodigious amounts, is typically disposed of in municipal landfills lacking special protections for hazardous waste. Radioactivity in drill cuttings has been shown to exceed, in some cases, the regulatory limits for landfills that accept fracking waste. New research suggests that the chemical composition of fracking fluid itself helps to mobilize radioactive materials in the shale.*

- March 15, 2019 – Due to a 1980 hazardous waste exemption from the Resource Conservation and Recovery Act (RCRA), drill cuttings from oil and gas fields became exempt from federal oversight, leaving it to states to regulate the disposal of this solid waste stream. A team of researchers measured radioactivity in drill cuttings extracted from Pennsylvania wells and found levels of radium-226 and radium-228 that exceeded the regulatory limits for landfills in Ohio and New York, two states where there are regulatory limits and that accept fracking waste from other states, including from Pennsylvania. The authors recommended rescinding the RCRA exemption for hazardous fracking waste to better protect public health.<sup>496</sup>
- August 3, 2018 – A two-part study by Dartmouth College researchers investigated the source of radium in fracking wastewater from Marcellus Shale wells. By comparing the isotopic ratios, they showed that the high salinity of the wastewater is responsible for extracting radium from the shale. “Experimental results and wastewater data together provide a coherent picture, that the distinctive Ra isotopic signature of Marcellus wastewaters results from contemporaneous water-rock interactions that promote

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<sup>496</sup> Swiedler, E. W., Muehlenbachs, L. A., Chu, Z., Shih, J.-S., & Krupnick, A. (2019). Should solid waste from shale gas development be regulated as hazardous waste? *Energy Policy*, 129, 1020-1033. doi: 10.1016/j.enpol.2019.02.016

desorption of <sup>226</sup>Ra from organics during hydraulic fracturing.”<sup>497</sup> In the second part of the study, the researchers used mass balance and isotope mixing models to attribute both the extreme salinity and the presence of radium in liquid fracking waste to the progressive, hydrologic enrichment of injected fluids during hydraulic fracturing.<sup>498</sup> In sum, the chemical composition of fracking fluid itself and its interactions with black shale during the fracking process combine to make fracking waste radioactive. Explaining these findings in a news article, co-author Makul Sharam said, “Radium is sitting on mineral and organic surfaces within the fracking site waiting to be dislodged. When water with the right salinity comes by, it takes it on the radioactivity and transports it.”<sup>499</sup>

- February 19, 2018 – A study conducted in the Bakken Shale region of North Dakota used a multivariate regression model to predict radium-226 levels in fracking wastewater based on levels of other elements (barium, strontium, calcium). Their simulation model gave results that align with the extremely limited actual data based on direct measurements of radionuclides in Bakken Shale wastewater. The research team then used their model to predict potential harm to human health based on spills into surface water that is issued as a source of drinking water, irrigation, and recreational fishing. Even in the best-case scenario, using simulated concentrations on the low end, the results indicated that “there is potential risk to human health” in North Dakota due to radium-226 in fracking wastewater spills. This model can be used for any area where oil and gas waste is produced. “Overall, the results presented in this study can be treated as a warning and a reference to conduct further investigations.”<sup>500</sup>
- February 6, 2018 – A research team from City University of New York School of Public Health and Health Policy surveyed the various state-based regulations and state licensing requirements governing the disposal of radioactive waste from oil and gas waste streams. They found that 17 states had drafted express regulations to reduce exposure to radiation from oil and gas waste. States with active oil and gas drilling that lack such regulations “may leave the public and workers susceptible to adverse health effects from radiation.” Among the authors’ policy recommendations: due to accumulation of radioactivity on equipment, future studies should explore impacts on workers; exposed workers should wear badges to monitor exposures; worker exposures should be limited by shift changes; regulations across states should be harmonized to prevent cross-state dumping of large

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<sup>497</sup> Landis, J. D., Sharma, M., Renock, D., & Niu, D. (2018). Rapid desorption of radium isotopes from black shale during hydraulic fracturing. 1. Source phases that control the release of Ra from Marcellus Shale. *Chemical Geology*, 496, 1-13. doi: 10.1016/j.chemgeo.2018.06.013

<sup>498</sup> Landis, J. D., Sharma, M., & Renock, D. (2018). Rapid desorption of radium isotopes from black shale during hydraulic fracturing. 2. A model reconciling radium extraction with Marcellus wastewater production. *Chemical Geology*, 500, 194-206. doi: 10.1016/j.chemgeo.2018.08.001

<sup>499</sup> Dartmouth College. (2018, September 18). How slick water and black shale in fracking combine to produce radioactive waste. *Science Daily*. Retrieved from <https://www.sciencedaily.com/releases/2018/09/180918154831.htm>

<sup>500</sup> Torres, L., Yadav, O. P., & Khan, E. (2018). Risk assessment of human exposure to Ra-226 in oil produced water from the Bakken Shale. *Science of the Total Environment*, 626, 867-874. doi: 10.1016/j.scitotenv.2018.01.171

amounts of radioactive solid waste and assure protection of the public from the risk of radiation from exposure to oil and gas drilling wastes.<sup>501</sup>

- January 4, 2018 – A research team from Duke and Pennsylvania State universities collected stream sediments upstream and downstream from three disposal sites in Pennsylvania that receive oil and gas wastewater, treat it, and release it into surface water. While the practice of treating and dumping liquid waste from fracking operations into Pennsylvania streams largely ended in 2011, these three facilities continue to treat and release waste from conventional drilling operations. The researchers consistently detected elevated radioactivity in stream sediments in the vicinity of the outfall compared to upstream areas. The ratios of radium isotopes to their decay products showed that some of the radium had accumulated in the sediments in recent years—after discharges of fracking waste had been halted. Hence, radioactivity from conventionally drilled wells is the likely source of the high levels of radium in sediments downstream from these three treatment plants. Consequently, policies that prohibit disposal only of fracking waste fluids “are not adequate in preventing radioactive contamination in sediments at disposal sites.” Permission to treat and release any type of oil and gas wastewater via centralized waste treatment facilities “should be reconsidered.”<sup>502</sup>
- September 22, 2017 – State health regulators confirmed that unknown quantities of radioactive waste from drilling and fracking operations have been illegally buried in Colorado landfills not permitted to accept it.<sup>503</sup>
- November 23, 2016 – University of Iowa researchers evaluated radioactive materials—uranium, thorium, radium, lead, and polonium isotopes—from drill cutting samples extracted from a single well drilled in northern Pennsylvania. They found complex patterns of vertical stratification. For example, the deep drill cuttings had significantly more uranium (U) than the cuttings removed from shallow portions of the well. Noting that virtually all drill cutting waste from the Marcellus Shale is deposited in landfills, the authors examined the stability of the various radioactive materials by simulating different conditions of landfill leaching. The results suggested some environmental mobility of radionuclides in drill cuttings. In particular, as acidity increased, radionuclide leaching increased, with <sup>238</sup>U and <sup>234</sup>U being the most leachable radionuclides. The authors concluded, “Although previous studies have suggested that [radioactive materials] in drill cuttings pose a minimal health risk to the general public when deposited in landfills, our

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<sup>501</sup> Geltman, E. A. G., & LeClair, N. (2018). Variance in state protection from exposure to NORM and TENORM wastes generated during unconventional oil and gas operations: Where we are and where we need to go. *New Solutions*, 28(2), 240-261. doi: 10.1177/1048291118755387

<sup>502</sup> Lauer, N. E., Warner, N. R., & Vengosh, A. (2018). Sources of radium accumulation in stream sediments near disposal sites in Pennsylvania: Implications for disposal of conventional oil and gas wastewater. *Environmental Science & Technology*, 52, 955-962. doi: 10.1021/acs.est.7b04952

<sup>503</sup> Finley, B. (2017, September 22). Colorado landfills are illegally burying low-level radioactive waste from oil and gas industry, Denver Post learns. *Denver Post*. Retrieved from <https://www.denverpost.com/2017/09/22/colorado-landfills-illegally-burying-radioactive-waste-oil-gas/>

results indicate that Marcellus Shale drill cuttings warrant further radiochemical investigation.”<sup>504</sup>

- April 27, 2016 – Duke University researchers who studied oil and gas wastewater (“brine”) spills reported that “the water contamination from brine spills is remarkably persistent in the environment, resulting in elevated levels of salts and trace elements that can be preserved in spill sites for at least months to years ....” In addition, radioactivity was elevated in soil and sediment sampled at spill sites, indicating that radium had accumulated in the soils of spill-affected areas.<sup>505</sup> The bigger the spill, the higher the soil radioactivity level. Study author Avner Vengosh told *InsideClimate News*, “We found even if you take away the spill water... you still left behind the legacy of radioactivity in the soils,” where it can linger for thousands of years.<sup>506</sup>
- March 10, 2016 – Louisville’s *Courier-Journal* reported on illegal dumping of radioactive oil and gas drilling wastes in two Kentucky landfills. Landfill operators in Greenup and Estill counties were issued violation notices for failing to “accurately characterize the waste for what it was, allowing what’s considered an illegal release of a hazardous material into the environment.” The illegal dumping at the Greenup County landfill alone consisted of 369 tons of radioactive drilling waste.<sup>507</sup>
- February 26, 2016 – Radioactive oil and gas waste from fracking operations in Ohio, Pennsylvania, and West Virginia was illegally sent to Estill County, Kentucky’s Blue Ridge Landfill. The radioactive level of the material that was buried “was at least 340 times more than the amount that is allowed to be buried at a solid waste landfill,” according to WKYT in Lexington. WKYT reported that Estill County leaders would “fight ‘tooth and toenail’ to get the bottom of how low-level radioactive waste ended up in a county landfill,” and do its own testing at the landfill and nearby schools.<sup>508</sup>
- November 23, 2015 – Absence of federal oversight and, in some cases, a total lack of state regulations for handling radioactive oil and gas waste was the topic of a report in *High Country News*, which detailed the regulatory situation in six Western states: Colorado, Idaho, Montana, North Dakota, South Dakota, and Wyoming. North Dakota alone generates an estimated 70 tons a day of radioactive oil and gas waste. “Because the waste is often too radioactive to be disposed of in landfills, it sometimes gets dumped

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<sup>504</sup> Eitrheim, E. S., May, D., Forbes, T. Z., & Nelson, A. W. (2016). Disequilibrium of naturally occurring radioactive materials (NORM) in drill cuttings from a horizontal drilling operation. *Environmental Science & Technology Letters* 3, 425-29. doi: 10.1021/acs.estlett.6b00439

<sup>505</sup> Lauer, N. E., Harkness, J. S., & Vengosh, A. (2016). Brine spills associated with unconventional oil development in North Dakota. *Environmental Science & Technology*, 50(10), 5389–5397. doi: 10.1021/acs.est.5b06349

<sup>506</sup> Hirji, Z. (2016, April 29). Persistent water and soil contamination found at N.D. wastewater spills. *InsideClimate News*. Retrieved from <http://insideclimatenews.org/news/29042016/north-dakota-wastewater-spill-water-soil-contamination-radium-selenium-bakken-oil>

<sup>507</sup> Bruggers, J. (2016, March 10). State begins crackdown on radioactive waste. *Courier-Journal*. Retrieved from <http://www.courier-journal.com/story/tech/science/environment/2016/03/08/state-orders-end-hauling-radioactive-waste/81496490/>

<sup>508</sup> WKYT. (2016, February, 26). Estill County leaders to fight 'tooth and toenail' over radioactive waste in landfill. WKYT. Retrieved from <http://www.wkyt.com/content/news/Estill-Co-leaders-to-fight-tooth-and-toenail-over-radioactive-waste-in-landfill-370308981.html>



illegally.” Proposed new rules in North Dakota would raise the radioactivity limit for the waste.<sup>509</sup>

- July 8, 2015 – Radium-226 is the dominant radioactive material in flowback water from hydraulically fractured wells in the Marcellus Shale. A Pittsburgh team of researchers studied its fate in three wastewater storage pits in southwestern Pennsylvania over a 2.5-year period of time. They found that radium-226 concentrations increased when flowback water was being reused for additional fracking operations. Also, radium-226 tended to accumulate in the bottom sludge. This sludge could be classified as radioactive solid waste because it exceeded the radium-226 limit for landfill disposal. A risk assessment showed that potential radiation dose equivalent levels around the three fracking waste pits were within the regulatory limit for the general public.<sup>510</sup>
- April 9, 2015 – A Johns Hopkins Bloomberg School of Public Health study found that levels of radon in Pennsylvania homes—a region with some of the highest indoor radon concentrations in the US—have been rising since 2004, around the time the fracking industry arrived in the state.<sup>511</sup> Radon exposure is the second leading cause of lung cancer worldwide, after cigarette smoking.<sup>512</sup> Researchers found that buildings in counties where the most fracking has taken place in the past decade have had significantly higher radon readings compared with those in low-fracking areas, a difference that did not exist before 2004. Use of well water was associated with 21 percent higher indoor radon concentrations than in buildings using public water sources. This study, the first to define and evaluate the predictors of indoor radon concentrations in Pennsylvania, concluded that radon’s presence was related to geology, water sources, weather, and natural gas drilling.<sup>513</sup>
- April 2, 2015 – A team of toxicologists, geochemists, and radiation scientists led by the University of Iowa analyzed the contribution of various naturally occurring radioactive materials (NORM) to the total radioactivity of fracking waste fluids, finding evidence of long-lived, environmentally persistent radioactive decay products.<sup>514</sup> “NORM is emerging as a contaminant of concern in hydraulic fracturing/unconventional drilling

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<sup>509</sup> Peterson, J. (2015, November 23). States lack rules for radioactive drilling waste disposal. *High Country News*. Retrieved from <http://www.hcn.org/articles/states-lack-rules-for-handling-radioactive-drilling-waste>

<sup>510</sup> Zhang, T., Hammock, R. W., & Vidic, R. D. (2015). Fate of radium in Marcellus Shale flowback water impoundments and assessment of associated health risks. *Environmental Science & Technology* 49, 9347-54. doi: 10.1021/acs.est.5b01393

<sup>511</sup> Casey, J. A., Ogburn, E. L., Rasmussen, S. G., Irving, J. K., Pollak, J., Locke, P. A., & Schwartz, B. S. (2015). Predictors of indoor radon concentrations in Pennsylvania, 1989-2013. *Environmental Health Perspectives*. Advance online publication. doi: 10.1289/ehp.

<sup>512</sup> National Cancer Institute (2011, December 6). *Radon and cancer fact sheet*. Retrieved from <http://www.cancer.gov/about-cancer/causes-prevention/risk/substances/radon/radon-fact-sheet>

<sup>513</sup> Hurdle, J., & Phillips, S. (2015, April 9). New study raises possible link between gas drilling and radon levels. *StateImpact Pennsylvania*. Retrieved from <http://stateimpact.npr.org/pennsylvania/2015/04/09/new-study-raises-possible-link-between-gas-drilling-and-radon-levels/>

<sup>514</sup> Nelson, A. W., Eittrheim, E. S., Knight, A. W., May, D., Mehrhoff, M. A., Shannon, R., . . . Schultz, M.K. (2015). Understanding the radioactive in growth and decay of naturally occurring radioactive materials in the environment: An analysis of produced fluids from the Marcellus Shale. *Environmental Health Perspectives*, 123(7). doi: 10.1289/ehp.1408855

wastes, yet the extent of the hazard is currently unknown.” The study determined that previous testing and study methods likely underestimate radioactivity by focusing only on radium. The researchers developed a new method to accurately predict the concentrations of uranium, thorium, and radium and their alpha-emitting progeny, polonium and lead, in fracking wastewater. They found that, under certain conditions, radioactivity increased over time, due to ingrowth of alpha-emitting radioactive progeny of long-lived parent radionuclides such as radium. The authors warned that these decay products may potentially contaminate recreational, agricultural, and residential areas, and that a more detailed understanding is needed of how radionuclides accumulate in higher organisms. In an accompanying article in *Environmental Health Perspectives*, James Burch, a University of South Carolina epidemiologist who was not involved in the study, said that fracking activities and wastewater disposal, which often take place in close proximity to where people live and work, raise risks for human exposure. “The technology is vastly outpacing what we know about the health effects.”<sup>515</sup>

- May 8, 2014 – A group of leading medical experts and the American Lung Association of the Northeast detailed research and growing concerns about potential health impacts of radon and radium associated with natural gas production and the Marcellus Shale, in particular. High levels of radiation in the Marcellus Shale could pose health threats if high concentrations of radon and its decay products travel with natural gas, a problem compounded by the short distance Marcellus gas could travel in pipelines to people’s homes.<sup>516</sup>
- March 24, 2014 – A team led by toxicology researchers at the University of Iowa identified high levels of radioactivity in fracking wastewater as a significant concern and noted that the testing methods used and recommended by state regulators in the Marcellus Shale region can dramatically underestimate the amount of radioactivity—specifically radium—in fracking wastewater.<sup>517</sup> Results obtained using EPA-recommended protocols can be obscured by the presence of other contaminant mixtures. Regarding the use of EPA protocols with fracking wastewater or other highly saline solutions, Duke University geochemist Avner Vengosh noted, “People have to know that this EPA method is not updated.”<sup>518</sup>
- February 2014 – The Marcellus Shale is known to have high uranium and radium content. According to Mark Engle, USGS geochemist, the concentration of radium-226 can exceed 10,000 picoCuries/Liter (pCi/L) in the shale. Radium-226 has a half-life of

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<sup>515</sup> Konkel, L. (2015). What's NORMal for fracking? Estimating total radioactivity for produced fluids. *Environmental Health Perspectives*, 123(7). Retrieved from <http://ehp.niehs.nih.gov/123-a186/>

<sup>516</sup> Campbell, J. (2014, May 8). Fracking critics keep pushing for state-backed health study. *Politics on the Hudson*. Retrieved from <http://polhudson.lohudblogs.com/2014/05/08/fracking-critics-keep-pushing-state-backed-health-study/>

<sup>517</sup> Nelson, A. W., May, D., Knight, A. W., Eitrrheim, E. S., Mehrhoff, M., Shannon, R., . . . Schultz, M. K. (2014). Matrix complications in the determination of radium levels in hydraulic fracturing flowback water from Marcellus shale. *Environmental Science & Technology*, 1(3), 204-208. doi: 10.1021/ez5000379

<sup>518</sup> Kelly, S. (2014, March 24). Research shows some test methods miss 99 percent of radium in fracking waste. *Desmogblog.com*. Retrieved from <http://www.desmogblog.com/2014/03/23/some-testing-methods-can-miss-99-percent-radium-fracking-waste-new-research-reports>

1,600 years. Radium and other naturally occurring radioactive materials (NORM) can be released from shale rock during drilling and fracking and can emerge with flowback and produced waters. It can thus enter the ambient environment and become concentrated in the sludge that results from treatment of flowback water, and in river sediment around water treatment facilities. It can also be found in landfills in which sludge and sediment have been disposed. Some radium can be found in drinking water. Geochemist Avner Vengosh warned, “Once you have a release of fracking fluid into the environment, you end up with a radioactive legacy.”<sup>519</sup>

- October 2, 2013 – A peer-reviewed study of the impacts of drilling wastewater treated and discharged into a creek by a wastewater facility in western Pennsylvania documented radium levels approximately 200 times greater in sediment samples near the discharge location than in sediment samples collected upstream of the plant or elsewhere in western Pennsylvania. “The absolute levels that we found are much higher than what you allow in the U.S. for any place to dump radioactive material,” one of the authors told *Bloomberg News*. The pollution occurred despite the fact that the treatment plant removed a substantial amount of the radium from the drilling wastewater before discharging it. The researchers wrote that the accumulation of radium in sludge removed from the wastewater “could pose significant exposure risks if not properly managed.”<sup>520, 521</sup>
- February 2013 – In an analysis of fracking sludge samples from Pennsylvania, researchers “... confirmed the presence of alpha, beta, and gamma radiation in the soil and water in reserve pits located on agricultural land.” Total beta radiation exceeded regulatory guideline values by more than 800 percent, and elevated levels of some of the radioactive constituents remained in a vacated pit that had been drained and leveled. It is imperative, the research team concluded, “that we obtain better knowledge of the quantity of radioactive material and the specific radioisotopes being brought to the earth’s surface from these mining processes.”<sup>522</sup>
- July 26, 2012 – Responding to concern about radon in natural gas produced from the Marcellus Shale, the USGS analyzed ten samples of gas collected near the wellheads of three Pennsylvania gas wells. The agency found radon levels ranging from 1-79 picocuries per liter, with an average of 36 and a median of 32. (The highest radon activity reported here would decay to 19.8 pCi/L in approximately a week; by comparison, the EPA’s threshold for indoor air remediation is 4 pCi/L.) Asserting they knew of no

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<sup>519</sup> Brown V. J. (2014). Radionuclides in fracking wastewater. *Environmental Health Perspectives* 122(2), A50-A55. doi: 10.1289/ehp.122-A50

<sup>520</sup> Warner, N. R., Christie, C. A., Jackson, R. B., & Vengosh, A. (2013). Impacts of shale gas wastewater disposal on water quality in Western Pennsylvania. *Environmental Science & Technology*, 47(20), 11849-11857. doi: 10.1021/es402165b

<sup>521</sup> Efstathiou, J., Jr. (2013, October 2). Radiation in Pennsylvania creek seen as legacy of fracking. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2013-10-02/radiation-in-pennsylvania-creek-seen-as-legacy-of-frackin.html>

<sup>522</sup> Rich, A. L., & Crosby, E. C. (2013). Analysis of reserve pit sludge from unconventional natural gas hydraulic fracturing and drilling operations for the presence of technologically enhanced naturally occurring radioactive material (TENORM). *NEW SOLUTIONS: A Journal of Environmental and Occupational Health Policy*, 23(1), 117-135. doi: 10.2190/NS.23.1.h

previous published measurements of radon in natural gas from the Appalachian Basin, which contains the Marcellus Shale, agency scientists concluded that the number of samples “is too small to ... yield statistically valid results” and urged “collection and interpretation of additional data.”<sup>523</sup>

- January 11, 2012 – In its review of the New York State Department of Environmental Conservation’s (NYS DEC) Supplemental Generic Environmental Impact Statement (SGEIS) on high volume fracturing, the EPA expressed concerns about the diffusion of responsibility for the ultimate disposal of radioactive wastes generated by treatment or pretreatment of drilling wastewater. The EPA also raised concerns about the lack of analysis of radon and other radiation exposure. “Who is responsible for addressing the potential health and safety issues and associated monitoring related to external radiation and the inhalation of radon and its decay products?” the EPA asked. “Such potential concerns need to be addressed.”<sup>524</sup>
- September 7, 2011 – The USGS reported that radium levels in wastewater from oil and gas wells in New York and Pennsylvania, including those in the Marcellus Shale, “have a distinctly higher median ... than reported for other formations in the Appalachian Basin, and range to higher values than reported in other basins.” The median level of radium found in Marcellus Shale wastewater in New York, 5,490 pCi/L, is almost 1,100 times the maximum contaminant level for drinking water, which is five pCi/L. In other words, if a million gallons of Marcellus Shale wastewater contaminated with the median level of radium found in New York were to spill into a waterway, 1.1 billion gallons of water would be required to dilute the radium to the maximum legal level.<sup>525</sup> (The EPA’s health-based goal for radium in drinking water is zero.) Over time, radium naturally decays into radioactive radon gas. Thus, higher radium levels also suggest that higher levels of radon may also be present in natural gas produced from the Marcellus Shale.
- February 27, 2011 – The *New York Times* reported on the threat to New York’s drinking water from Pennsylvania drilling waste due to the presence of chemical contaminants, including high levels of radioactivity. The investigation found that sewage treatment plants were neither testing for nor capable of removing that radioactivity, which was subsequently discharged into waterways that supply drinking water, and that, in some cases, wastewater contained radium levels that were hundreds of times higher than the drinking water standard. Drillers sent some of this waste to New York State for disposal even though, as the article noted, EPA scientists had warned the state about this very

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<sup>523</sup> Rowan, E. L., & Kraemer, T. F. (2012). *Radon - 222 content of natural gas samples from upper and middle Devonian sandstone and shale reservoirs in Pennsylvania: Preliminary data*. United States Geological Survey. (Rep.). Retrieved from <http://pubs.usgs.gov/of/2012/1159/ofr2012-1159.pdf>

<sup>524</sup> Environmental Protection Agency. (2012, January 11). *EPA comments on revised draft NYSDEC revised dSGEIS for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* [Press release]. Retrieved from

<http://www.epa.gov/region2/newsevents/pdf/EPA%20R2%20Comments%20Revised%20dSGEIS%20Enclosure.pdf>

<sup>525</sup> Rowan, E. L., Engle, M. A., Kirby, C. S., & Kraemer, T. F. (2011, September 7). *Radium content of oil- and gas-field produced waters in the northern Appalachian basin (USA): Summary and discussion of data*. (Rep United States Geological Survey. Retrieved from <http://pubs.usgs.gov/sir/2011/5135/>  
<http://water.epa.gov/drink/contaminants/basicinformation/radionuclides.cfm>

problem in a December 2009 letter that advised against sewage treatment plants accepting drilling waste with radium levels 12 or more times as high as the drinking water standard.<sup>526</sup>

- 2008-2009 – The New York State DEC found that wastewater from 11 of 13 vertical wells drilled in New York’s Marcellus Shale in 2008 and 2009 contained radium levels ranging from 400 times to nearly 3,400 times EPA’s safe level limit for radium in drinking water. These figures later informed the 2011 study of radium in drilling wastewater conducted by the USGS.<sup>527</sup>

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<sup>526</sup> Urbina, I. (2011, February 26). Regulation lax as gas wells’ tainted water hits rivers. *The New York Times*. Retrieved from [http://www.nytimes.com/2011/02/27/us/27gas.html?pagewanted=all&\\_r=0](http://www.nytimes.com/2011/02/27/us/27gas.html?pagewanted=all&_r=0)

<sup>527</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (5-133, 5-141, 7-60, Appendix 12, Appendix 13, Rep.).

## Occupational health and safety hazards

*Drilling and fracking jobs are among the most dangerous jobs in the nation with a fatality rate that is four to seven times the national average. Irregularities in reporting practices mean that counts of on-the-job fatalities among oil and gas workers are likely underestimates. Contract workers are especially at risk. Occupational hazards include head injuries, traffic accidents, blunt trauma, burns, inhalation of hydrocarbon vapors, toxic chemical exposures, heat exhaustion, dehydration, and sleep deprivation. An investigation of occupational exposures found high levels of benzene in the urine of wellpad workers, especially those in close proximity to flowback fluid coming up from wells following fracturing activities. Exposure to silica dust, which is definitively linked to silicosis and lung cancer, was singled out by the National Institute for Occupational Safety and Health (NIOSH) as a particular threat to workers in fracking operations where silica sand is used. At the same time, research shows that many gas field workers, despite these serious occupational hazards, are uninsured or underinsured and lack access to basic medical care.*

*In 2018, the first independent investigation of its kind showed that pipeline construction workers die on the job 3.6 times more often than the average U.S. worker. Pipeline worker deaths occur from crushings, fires, and heat exhaustion. The number of miles of U.S. pipelines tripled from 2006 to 2016, and newer pipelines are less safe than older ones. Pipelines built after 2010 suffer higher failure rates than pipelines built at any other time.*

- February 19, 2019 – An investigation into the death of oil worker Dennis Mason by *E&E News* shows how inhalation of toxic vapors is systematically overlooked as a possible cause of workplace mortality and “indicates that more than four years after worker safety officials started warning of the lethal dangers of inhaling petroleum gases, the danger is still ignored in some corners of the oil patch.”<sup>528</sup> NIOSH has linked at least 13 oil worker deaths to inhalation of petroleum gases, such as butane and propane. However, because medical examiners do not always test for the substances, and attribute the deaths to “natural causes,” there are likely more. In this case, The Occupational Safety and Health Administration (OSHA) investigators immediately suspected that Dennis Mason was killed by toxic vapors and sent information and materials to the responsible Oklahoma state medical examiner, but state officials said they did not receive them. These materials included a paper by an occupational medicine specialist describing how exposure to high concentrations of hydrocarbon gases and vapors in an oxygen-deficient atmosphere can result in sudden cardiac death among oil and gas extraction workers. Instead, the medical examiner tested only for illegal drugs and alcohol before attributing his death to natural causes.
- February 13, 2019 – A series of catastrophic explosions and fires at a gas-processing facility in Pascagoula, Mississippi shut the plant down for six months in June 2016. This facility receives raw gas from drilling operations and separates it into natural gas and hydrocarbon liquids, which are used to make petrochemicals. The U.S. Chemical Safety

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<sup>528</sup> Soraghan, M. (2019, February 19). Missed connections leave questions in oil worker's death. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060121345>

Board’s final report identified “thermal fatigue” as the probable cause of the series of conditions leading to the explosions. A “major loss of containment” in a heat exchanger resulted in the release of methane, ethane, propane, and several other hydrocarbons, which subsequently ignited. The report’s interactive 3D model showed that the heat exchanger used at the Enterprise Plant, as well as at over 500 other U.S. gas processing facilities, is innately vulnerable to thermal fatigue. The timing of the explosions at the Pascagoula Gas Plant, which occurred shortly before midnight, likely prevented injuries. According to the final report, had the event happened during the day, with many more workers present, the consequences could have been much worse. The report noted that many nearby residents chose to evacuate, and afterwards, a local community organization informed the Board that residents did not know how to respond to the explosions. “They felt uninformed and ill equipped to know if they were in harm’s way.” The final report’s recommendations included the development of a “robust and engaged community alert network.”<sup>529</sup>

- December 21, 2018 – In the decade between 2008 and 2017, 1,566 U.S. workers died from on-the-job injuries in the oil and gas drilling industry and related fields. These figures were derived from data collected by the U.S. Department of Labor’s Bureau of Labor Statistics as part of a special investigative report that included participation by the *Texas Tribune*. In a slightly longer overlapping period, OSHA cited companies in the oil and gas extraction industry for 10,873 violations and investigated 552 accidents that had resulted in at least one worker death. Upstream drilling and fracking operations are exempt from safety rules that govern all downstream sectors of the oil and gas industry. Among these are rules that require refineries, petrochemical plants, and other high-hazard operations to adopt procedures to prevent fires, explosions, and chemical leaks. The investigation detailed a number of specific oil and gas industry deaths in Texas, highlighting the various preventative and regulatory failures associated with traumatic injury; exposure to toxic gases, including hydrogen sulfide; and blowout risk and fires.<sup>530</sup>
- October 11, 2018 – In addition to social isolation and the wide-ranging effects of job-related stress, the physical costs to wellpad workers are high, according to a qualitative study on oil workers’ social, emotional, and psychological well-being. The study consisted of in-depth interviews with 14 oil industry workers in Alberta, Canada. Twelve were men and two were women. Thirteen of the fourteen workers were employed by third-party contractors. They included heavy-equipment operators, surveyors, health and safety specialists, environmentalists, biologists, wireline engineers, derrick hands, consultants, and drillers. All were rotational workers. Rotational work involves travel to various oil fields and working extended shift schedules, which typically involves 21 consecutive days of work followed by three days off. Most of the respondents said they experienced physical pain on a somewhat regular basis. These findings corroborate the results of other studies reviewed by the authors. “Rotational oil field workers are

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<sup>529</sup> U.S. Chemical Safety Board. (2019, February 13). *Loss of containment, fires, and explosions at Enterprise Products Midstream Gas Plant*. Investigation Report No. 2016-02-I-MS. Retrieved from [https://www.csb.gov/assets/1/6/final\\_case\\_study\\_-\\_enterprise.pdf](https://www.csb.gov/assets/1/6/final_case_study_-_enterprise.pdf)

<sup>530</sup> Morris, J. (2018, December 21). Death in the oilfields. *Texas Tribune*. Retrieved from <https://www.texastribune.org/2018/12/21/death-oilfields-fossil-fuel-boom-brings-mounting-risks/>

vulnerable to personal, social, and economic stressors that may result in degraded wellbeing.... As we explored here, ‘good jobs’ in the patch come at a steep psychosocial and physical health cost to the labourers.”<sup>531</sup>

- October 10, 2018 – The most “cohesive explanation yet” for one of the worst oil field accidents in U.S. history, the January 2018 Oklahoma well fire which killed five workers, came from a lawsuit based on dozens of depositions. OSHA had sought penalties but did not offer an explanation, and the U.S. Chemical Safety Board stated plans to issue a report over a year later. (See Emerging Trend 6 in the front matter of this report, regarding the findings of the final report.) The factors explained in the lawsuit included ignoring warnings about using a cheaper and lighter drilling mud, and a broken and locked door out of which the five workers may have been able to escape.<sup>532</sup> The operating company blamed contractors.<sup>533</sup> (See also entry below for August 16, 2018.)
- September 12, 2018 – In 2016, oil and gas pipeline construction workers died on the job 3.6 times more often than the average U.S. worker, as determined by the first independent investigation to compile and present fatality rates for those who build oil and gas pipelines in the United States. That same year oil and gas pipeline construction workers had the highest death rate and number of deaths for those employed in these jobs since 2012. “If we add the deaths of workers whose job it is to maintain and monitor the pipelines as they carry the fuels (pipeline transport), 2016 was the deadliest year for oil and gas pipeline workers since 2009.”<sup>534</sup> Pipeline worker deaths occurred from crushings, fires, and heat exhaustion. The number of miles of U.S. pipelines carrying oil and other hazardous liquids tripled from 2006 to 2016, and newer pipelines are less safe than old ones. Pipelines built after 2010 suffer failures at a higher rate than pipelines built “at any time in the last century,” with pipelines carrying natural gas over five times more disaster-prone. The author made available her complete methodology and references for the project, with a discussion of her methodology and other data sources, including strengths, weaknesses, and comparability. Her stated intention in building a first-of-its kind oil and gas pipeline fatality report was to be “as straightforward and replicable as possible.”<sup>535</sup>
- August 20, 2018 – Nearly 1,000 workers have been killed in the ten years since hydraulic fracturing and horizontal drilling technologies rapidly expanded, although the current oil and gas worker fatality rate is down from its earlier high at seven times higher than across

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<sup>531</sup> Wright, A. C., & Griep, Y. (2019). Burning the midnight oil: Examining wellbeing and vulnerability in Alberta’s oil patch. *The Extractive Industries and Society*, 6, 77–84. Advance online publication. doi: 10.1016/j.exis.2018.10.001

<sup>532</sup> Soraghan, M. (2018, October 10). Okla. company scrimped before deadly well fire. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060102139>

<sup>533</sup> Soraghan, M. (2018, October 23). Well operator in fatal fire blames contractors. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060104019>

<sup>534</sup> Juhasz, A. (2018, September 12). Death on the Dakota Access: An investigation into the deadly business of building oil and gas pipelines. *Pacific Standard*. Retrieved from <https://psmag.com/magazine/death-on-the-dakota-access>

<sup>535</sup> Juhasz, A. (2018, September 12). Methodology for calculating mortality rates. *Pacific Standard*. Retrieved from <https://psmag.com/magazine/methodology-for-calculating-fatality-rates>



all industries. Persistent fatality risk factors include the practice of manual tank gauging, vehicle crashes, and inexperienced workers.<sup>536</sup>

- August 16, 2018 – On January 22, 2018, five workers were killed during the drilling of a gas well in Pittsburg County, Oklahoma. While the drill pipe was being lifted, a mixture of mud and gas blew upwards out of the well, and the gas subsequently ignited and exploded. A “factual update” as part of the ongoing investigation by the U.S. Chemical Safety Board found that a piece of safety equipment designed to control the release of fluids from the well was unable to fully close on the day of the accident and that other safety corners had been cut.<sup>537</sup>
- April 29, 2018 – Improper or inadequate use of personal protective equipment was of highest concern in a survey of industry workers and regulators that was designed to find the frequency of “failure incidents” and near misses at wellhead sites. Workers and regulators also cited spills of flowback water due to equipment failure as a major concern, with regard to the welfare of both workers and the general public, as these spills “occur more frequently than any other scenario examined in this study.”<sup>538</sup>
- April 26, 2018 – There were 63 deaths in oil and gas extraction in 2016, as reported in the 2018 edition of the AFL-CIO report, *Death on the Job, The Toll of Neglect*. The fatality rate for the overall mining sector, which includes oil and gas extraction, was 10.1 per 100,000 workers, nearly three times the national average. These 63 deaths in oil and gas accounted for 71 percent of the total number of fatal work injuries in the mining sector.<sup>539</sup>
- March 21, 2018 – The trade publication, *Industrial Safety & Hygiene News*, published a summary of January 2015 to February 2017 oil and gas extraction worker “incidents,” which included 481 hospitalizations and 166 amputations. The article outlined the data gaps and limitations that make accurate tallies of severe injuries in upstream oil and gas operations hard to calculate:
  - State-run OSHA programs are not included in the count.
  - Reporting errors and underreporting are common. Based on workers compensation data, underreporting is estimated at 50 percent; self-reported incidents may lack crucial detail or information.
  - OSHA jurisdiction does not cover incidents that occur on public streets, highways, or during commuting.

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<sup>536</sup> King, P. (2018, August 20). Even 1 death is too many. What does it take to get to 0? *E&E News*. Retrieved from <https://www.eenews.net/stories/1060094701>

<sup>537</sup> U.S. Chemical Safety Board. (2018, August 16). CSB releases factual update on blowout and fire at Pryor Trust Gas Well in Pittsburg County, Oklahoma [Press release]. Retrieved from <https://www.csb.gov/csb-releases-factual-update-on-blowout-and-fire-at-pryor-trust-gas-well-in-pittsburg-county-oklahoma-/>

<sup>538</sup> Abualfaraj, N., Gurian, P. L., & Olson, M. S. (2018). Frequency analysis of failure scenarios from shale gas development. *International Journal of Environmental Research and Public Health*, 5(5). pii: E885. doi: 10.3390/ijerph15050885

<sup>539</sup> AFL-CIO. (2018). *Death on the job: The toll of neglect*. 27<sup>th</sup> Edition. Retrieved from <https://aflcio.org/reports/death-job-toll-neglect-2018>

- Trucking/hauling related incidents may be listed under other [National Association of Insurance Commissioners] codes.<sup>540</sup>
- December 6, 2017 – Two occupational fatalities and numerous injuries resulted from explosions and fires along oil and gas pipelines in Colorado in the time since two men were killed at home from such a blast in April 2016, according to a *Denver Post* investigation. One contract worker was killed and two others were injured in May while they “were changing ‘dump lines’ and ‘one or more tanks exploded,’ according to a report filed in [Colorado Oil and Gas Conservation Commission’s] database.” Another worker died of his burn injuries from a flash fire in November that broke out during work on a pipeline. “The COGCC did not receive a report on this incident... because the pipeline was a ‘gathering line’ outside the agency’s regulatory purview.” The investigation documented additional gaps in regulatory oversight and responses to deaths and injuries.<sup>541</sup>
- October 1, 2017 – An investigation by the *Toronto Star*, the *National Observer*, *Global News*, and four Canadian journalism schools reported on hydrogen sulphide (H<sub>2</sub>S)-related health threats and incidents (including one occupational death) in Saskatchewan, and government and industry failure to prevent, warn, and respond to this threat. The more than 50 reporters involved “examined thousands of industry and government documents, analyzed terabytes of data and delved into dozens of freedom-of-information requests,” documenting, for example, the existence of government data describing H<sub>2</sub>S “hotspots” across the province, that were never released to the public despite agency deliberations. In addition, reporters wrote,

Ministry and industry met four times between 2012 and 2014 to plot strategy, including emergency planning zones, a public communications document, a code of practice and a licensing regime for high-risk, single-well batteries. Those plans were never adopted, a ministry statement confirms.

An industry salesman was killed in 2014 while taking samples. A valve broke and the concentration of H<sub>2</sub>S in the spewed fluids, according to the company, “was estimated at 40,000 parts per million, more than enough to bring near-instant death.” The investigation found that four months after the death, “a secret ministry report listed 161 facilities ‘that may be in violation of (the ministry’s) sour gas emission control.’”<sup>542</sup>

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<sup>540</sup> Industrial Safety & Hygiene News (2018, March 21). Gaps in oil & gas extraction work fatalities and severe injury statistics. Retrieved from <https://www.ishn.com/articles/108304-gaps-in-oil-gas-extraction-work-fatalities-and-severe-injury-statistics>

<sup>541</sup> Finley, B. (2017, December 6). A dozen fires and explosions at Colorado oil and gas facilities in 8 months since fatal blast in Firestone. *Denver Post*. Retrieved from <http://www.denverpost.com/2017/12/06/colorado-oil-gas-explosions-since-firestone-explosion/>

<sup>542</sup> Cribb, R., Sonntag, P., Elliot, P. W., & McSheffrey, E. (2017, October 1). That rotten stench in the air? It’s the smell of deadly gas and secrecy. *Thestar.com*. Retrieved from <https://www.thestar.com/news/canada/2017/10/01/that-rotten-stench-in-the-air-its-the-smell-of-deadly-gas-and-secrecy.html>

- August 24, 2017 – NIOSH’s Fatalities in Oil and Gas Extraction (FOG) database identified 88 fatal incidents accounting for 101 fatalities, for the year 2014. In ten of the 88 incidents, more than one worker was fatally injured. The FOG database was established to collect detailed information about deaths related to U.S. oil and gas extraction. The report, which represents only a portion of the deaths that occurred in the industry due to the focus and limitations of the database, aims to provide a deeper understanding of the circumstances of the fatalities, such as the industry group the worker was employed by, and operations and types of activities occurring at the time of the fatal incident. The majority of fatalities in FOG, 45 percent, involved workers employed by servicing companies. These servicing company worker fatalities occurred throughout oil and gas extraction operations: completions (14 fatalities), production (11 fatalities), and well servicing, workover, or intervention (5 fatalities). The industry group responsible for the second highest number of fatalities was drilling companies, at 27 percent, with most of those deaths occurring during drilling operations (20 fatalities). FOG data for 2015-2016 data was not yet available.<sup>543</sup>
- May 30, 2017 – In a “rare, but not unprecedented” case, the U.S. Environmental Protection Agency (EPA) opened an investigation of air emissions from two North Dakota oil well sites where worker deaths occurred in 2012 and 2014. EPA requested information from both companies to determine Clean Air Act compliance on the day of the deaths. According to the *E&E News* report, it was not clear whether the agency was “looking at civil or criminal sanctions.” Both workers, who were “flow testers,” “assigned to regularly measure tank levels by hand,” were found dead near tank hatches.<sup>544</sup> (No further information could be located on this investigation.)
- April 28, 2017 – Fatality rates for oil and gas extraction workers associated with falls increased two percent per year during 2003–2013, according to the Centers for Disease Control and Prevention’s *Morbidity and Mortality Weekly Report*. These 63 fatal falls represented 15 percent of the fatal events among this group in the time period. The majority of those who were killed by falls worked for drilling contractors. In the vast majority of cases, “fall protection was required by regulation, but it was not used, was used improperly, or the equipment failed.” Authors noted several limitations of their report, such as the lack of information on self-employed workers and lack of detail in some fatality reports.<sup>545</sup>
- April 26, 2017 – The 2017 edition of the AFL-CIO report, *Death on the Job: The Toll of Neglect*, which reported on the year 2015, showed that, although the number of deaths in the oil and gas extraction industries decreased compared to 2014 (89 compared to 144), employment in oil and gas extraction also decreased from 613,783 in 2014 to 533,184 in

<sup>543</sup> Ridl, S., Retzer, K., & Hill, R. (2017). *Oil and gas extraction worker fatalities 2014; NIOSH fatalities in oil and gas extraction (FOG) database*. Department of Health and Human Services, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health, DHHS (NIOSH). Publication No. 2017-193.

<sup>544</sup> Soraghan, M. (2017, May 30). EPA investigating emissions in tank deaths. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060055258>

<sup>545</sup> Mason, K. L., Retzer, K. D., Hill, R., & Lincoln, J. M. (2017). Occupational fatalities resulting from falls in the oil and gas extraction industry, United States, 2005–2014. *MMWR*, 66(16), 417–421. doi: <http://dx.doi.org/10.15585/mmwr.mm6616a2>

2015. The deaths in the oil and gas extraction industries “accounted for 74% of the fatal work injuries in the mining sector.” Referring to the challenges of getting a firm handle on statistics in this industry, the report stated that, “[f]atality rate data for the oil and gas industry are limited, but available data during the past seven years show fatality rates in oil and gas extraction that are four to seven times the national fatality rate.” Further, “[n]ot surprisingly, states with large amounts of oil and gas activity also have high job fatality rates.” Citing the continuing problem of assigning cause of death in the case of possible inhalation of toxic fumes, the report stated, “[w]hile some deaths are appropriately classified as inhalation deaths, others can be labeled as cardiac arrhythmia or respiratory failure, without further investigation as to whether the health event was induced by acute chemical exposure.” As in previous years, the report expressed concerns about the regulatory gaps in controlling a range of potentially fatal hazards in the industry.<sup>546</sup>

- February 1, 2017 – Caused by exposure to silica particles or dust, silicosis is a progressive, autoimmune disease that scars lung tissue and restricts the ability to breathe. Any level of exposure to respirable crystalline silica can trigger silicosis. A special report on the history of silicosis in the *Journal of Environmental Health* provided background on silicosis as a workplace threat in various industries and identified drilling and fracking operations as a source of contemporary exposure. The report predicts a future cluster of silicosis among well pad workers, noting that research has already identified “unacceptable levels” of silica dust in air samples collected at fracking operations and that workers are seldom offered appropriate respiratory equipment to prevent exposure. Fracking “has the potential for future clusters of silicosis cases to emerge.”<sup>547</sup>
- February 1, 2017 – University of Tennessee Civil and Environmental Engineering faculty investigated the occupational inhalation risks from the emissions of chemical storage tanks in 60,644 fracking wells. They also analyzed the combined occupational inhalation risks caused by open flowback pits and the storage tanks. They used AERMOD, the air pollution dispersion modeling system developed by the American Meteorological Society and EPA, and inhalation risk assessment to determine potential acute non-cancer, chronic non-cancer, acute cancer, and chronic cancer risks. Their results showed the percentage of wells presenting these risks were 12.41, 0.11, 7.53, and 5.80, respectively. They also found that the storage tanks presented the majority of the cancer risks, and the non-cancer risks were associated primarily to the open pits. The known human carcinogen formaldehyde was “the dominant contributor” to both acute (4,267 wells) and chronic (3,470 wells) cancer risk. Authors also reported that volatile organic compound (VOC) emissions from nearby wells and other on-site sources means that the data used in their study “were lower than reported concentrations from field measurements where higher occupational inhalation risks for exposure may be expected.”<sup>548</sup>

<sup>546</sup> AFL-CIO. (2017). *Death on the job: The toll of neglect*. 26<sup>th</sup> Edition. Retrieved from <https://aflcio.org/reports/death-job-toll-neglect-2017>

<sup>547</sup> Quail, M. T. (2017). Overview of silica-related clusters in the United States: Will fracking operations become the next cluster? *Journal of Environmental Health*, 79(6), 20-27.

<sup>548</sup> Chen, H., & Carter, K. E. (2017). Modeling potential occupational inhalation exposures and associated risks of toxic organics from chemical storage tanks used in hydraulic fracturing using AERMOD. *Environmental Pollution*, 224, 300-309. doi: 10.1016/j.envpol.2017.02.008

- January 19, 2017 – A group of Canadian physicians published a report documenting ten intentional intoxications from the ingestion of fracking fluid. Each individual survived, which the authors attribute to “[r]apid case finding and diligent contact tracing.” Their report, published in the *American Journal of Kidney Diseases*, focused on this appropriate response and treatment, but also described the “outbreak” challenge from a public health perspective and emphasized the need for prevention education and “requiring secure storage of these products.” Though the professions or workplaces of the patients are not described, presumably they were oil and gas industry workers with easy access to fracking fluid.<sup>549</sup>
- September 25, 2016 – A four-chapter investigative series by the *Denver Post* explored in detail Colorado’s 12-year record of an oil and gas worker dying, on average, every three months. The piece documented the obstacles present in even clarifying the occupational mortalities owing to the differing reporting practices of the Bureau of Labor Statistics, OSHA, and state officials. “Regulation is so disjointed that no one can even agree on the number of workers killed on the job.” Investigating the details of the deaths through any available records, the *Post* described a “regulatory vacuum,” as well as “little consequence” to the industry when deaths (or worksite violations) occur. Worker death circumstances examined in the piece included electrocutions, falls and collapsed structures, crushings by equipment, explosions, and a drowning in frack sand. The *Post* also identified five lawsuits over 15 years “in which workers alleged that they were punished for reporting injuries or safety hazards.”<sup>550</sup>
- April 27, 2016 – According to the 2016 edition of the AFL-CIO report, *Death on the Job: The Toll of Neglect*, the fatality rate for workers in the oil and gas extraction industries is nearly five times the national average, and the states with prominent oil and gas industries are among the most dangerous states to work. In addition, the report emphasized, the industry has been exempted from some critical OSHA standards, including that for carcinogenic benzene. The report also emphasized the danger of silica dust exposure in hydraulic fracturing-related work and the significant delays in controlling workers’ exposures in these operations. “Oil and gas extraction is subject to OSHA general industry and construction regulations, none of which are designed to address the particular safety and hazards in the oil and gas industry.... The escalating fatalities and injuries in the oil and gas extraction industry demand intensive and comprehensive intervention,” the report stated.<sup>551</sup>
- April 21, 2016 – According to an updated report from the Bureau of Labor Statistics, fatal work injuries in oil and gas extraction industries in 2014 reached a new high of

<sup>549</sup> Collister, D., Duff, G., Palatnick, W., Komenda, P., Tangri, N., & Hingwala, J. (2017). A methanol intoxication outbreak from recreational ingestion of fracking fluid. *American Journal of Kidney Diseases*, 69(5), 696-700. doi: 10.1053/j.ajkd.2016.10.029

<sup>550</sup> Sangosti, R.J. (2016, September 25). Drilling through danger. *Denver Post*. Retrieved from <http://extras.denverpost.com/oil-gas-deaths/index.html>

<sup>551</sup> AFL-CIO. (2016). *Death on the job: The toll of neglect*. 25<sup>th</sup> Edition. Retrieved from <http://www.aflcio.org/Issues/Job-Safety/Death-on-the-Job-Report>

- February 29, 2016 – *Inside Energy*’s report on high rates of hydrocarbon vapor poisoning among oilfield workers noted that an outdated reliance on manual measurements rather than automated monitoring contributes to ongoing toxic exposures of workers. Under federal oil and gas regulations, oil companies are effectively required to send workers “up on oil and gas tanks to manually measure crude oil, putting them at risk.” The report explained that the Bureau of Land Management (BLM) allows just one kind of automated measurement. The method is expensive and uncommonly used: “there are only 1,500 in use, compared to more than 83,000 oil tanks on federal land. By being so inflexible, BLM’s outdated rules make it very hard to use safer oil measuring devices while making manual oil tank measurement—which endangers workers—the most viable option for companies.”<sup>553</sup>
- February 19, 2016 – The fatal injuries of a backhoe operator who struck and hit an unmarked, high-pressure gas line in July 2015 prompted an investigation by *StateImpact* in Pennsylvania. The news group noted that “there are no local, state or federal rules on how deep the lines should be buried underground, or even if they’re buried at all. There are no standards for building and maintaining the lines. They don’t have to be marked. And the operator of the line doesn’t have to participate in PA One Call [a statewide communications system for preventing damage to underground facilities], which led to the fatality in Armstrong County.”<sup>554</sup>
- January 15, 2016 – In a publication in Centers for Disease Control’s *Mortality & Morbidity Weekly Report*, researchers urged local and state epidemiologists and medical examiners to not overlook hydrocarbon exposure as an underlying cause of death in gas and oil field workers. “Health and safety professionals need to recognize and act on nonfatal warning signs and symptoms, such as dizziness, confusion, immobility and collapse in oil and gas workers who might have been exposed to high concentrations of [hydrocarbon gas vapors] and to [oxygen]-deficient atmospheres.” Only three of nine deaths that occurred between 2010 and 2015 in the oil and gas fields west of Appalachia were ruled by coroners to have resulted from exposure to gas vapors, although all nine had opened hatches of storage tanks and were exposed to hydrocarbon vapors and oxygen-deficient air.<sup>555</sup> The *Pittsburgh Post-Gazette* quoted emeritus professor at the University of Pittsburgh Bernard Goldstein saying, “Occupational health experts also

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<sup>552</sup> U.S. Bureau of Labor Statistics. (2016, April 21). Revisions to the 2014 Census of Fatal Occupational Injuries (CFOI). Retrieved from [http://www.bls.gov/iif/cfoi\\_revised14.htm](http://www.bls.gov/iif/cfoi_revised14.htm)

<sup>553</sup> Guerin, E. (2016, February 29). “Senseless exposures”: How money and federal rules endanger oilfield workers. *Inside Energy*. Retrieved from <http://insideenergy.org/2016/02/29/senseless-exposures-how-money-and-federal-rules-endanger-oilfield-workers/>

<sup>554</sup> Phillips, S. (2016, February 19). Worker dies in pipeline accident, PUC steps up calls for reform. *StateImpact*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2016/02/19/worker-dies-in-pipeline-accident-puc-steps-up-calls-for-reform/>

<sup>555</sup> Harrison, R. J., Retzer, K., Kosnett, M. J., Hodgson, M., Jordan, T., Ridl, S., & Kiefer, M. (2016). Sudden deaths among oil and gas extraction workers resulting from oxygen deficiency and inhalation of hydrocarbon gases and vapors — United States, January 2010–March 2015. *Morbidity and Mortality Weekly Report*, 65(1), 6-9. Retrieved from <http://www.cdc.gov/mmwr/volumes/65/wr/mm6501a2.htm>

suspect that some deaths involving fires, falls, crashes and mishandling of equipment have resulted from faulty judgement or ‘wooziness’ associated with hydrocarbon vapor exposure ... [b]ut that underlying factor rarely shows up in fatality reports.”<sup>556</sup>

- December 14, 2015 – As reported in the *Guardian*, the suicide rate in the Canadian province of Alberta spiked by 30 percent spike in the first half of 2015, possibly linked to the boom-and-bust cycle of the fracking industry. At the time of reporting, 40,000 jobs had been lost in Alberta since the drop in oil prices in late 2014. Mental health professionals interviewed for the report included Edmonton social worker Leonard McEwan, who specializes in clinical crises intervention and whose patients include those directly or indirectly employed in the oil fields, noticed a sharp increase in suicides after the recent plunge in oil prices. As revealed in the investigative report, three in every four Alberta suicides are male and the vast majority are under 55. Gladys Blackmore, executive director of a mental health program that targets those employed in the industry, believes that young, male workers “living high-risk lifestyles, often in work camps, where they ‘fly-in/fly-out’ for up to 24 days at a time” are particularly vulnerable.<sup>557</sup>
- November 7, 2015 – The *Denver Post* reported on a “new federal database that was developed to more precisely capture the deadly nature of oil and gas extraction.” For Colorado, the national Fatalities in Oil and Gas Extraction (FOG) database contained two additional oil and gas worker deaths for 2014 than did the Bureau of Labor Statistics. “‘We knew from the Bureau of Labor Statistics data about the basics of what’s killing workers,’ said Kyla Retzer, an epidemiologist who led the effort to compile the FOG report. ‘We just wanted to be more in-depth in finding out what were the types of operations and equipment were involved in these deaths.’”<sup>558</sup> (See entry for August 24, 2017 above for official report.)
- November 4, 2015 – San Antonio’s *Express-News* Editorial Board called for specific actions to address Texas’s status “a national leader in oil field deaths.” The Board wrote that federal fines are too low and unchanged since 1991 and that there is no Level 1 trauma center south of San Antonio near the region’s oil- and gas-producing counties.<sup>559</sup>

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<sup>556</sup> Litvak, A. (2016, January 25). Vapors linked to oxygen depletion present hazard for oil, gas workers. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/policy-powersource/2016/01/25/Vapors-linked-to-oxygen-depletion-present-hazard-for-oil-gas-workers/stories/201601220095>

<sup>557</sup> Mouallem, O. (2015, December 14). The boom, the bust, the darkness: suicide rate soars in wake of Canada's oil crisis. *The Guardian*. Retrieved from [https://www.theguardian.com/world/2015/dec/14/canada-oil-production-crisis-suicide-alberta?CMP=share\\_btn\\_fb](https://www.theguardian.com/world/2015/dec/14/canada-oil-production-crisis-suicide-alberta?CMP=share_btn_fb)

<sup>558</sup> Whaley, M. (2015, November 7). Colorado oil deaths greater in 2014 than previously calculated. *Denver Post*. Retrieved from <http://www.denverpost.com/2015/11/07/colorado-oil-deaths-greater-in-2014-than-previously-calculated/>

<sup>559</sup> *Express-News* Editorial Board. (2015, November 4). Take care of the state’s oil, gas workers. *MySanAntonio.Com*. Retrieved from <http://www.mysanantonio.com/opinion/editorials/article/Take-care-of-the-state-s-oil-gas-workers-6611077.php>

- September 17, 2015 – The Bureau of Labor Statistics reported that the number of fatal work injuries in oil and gas extraction industries rose 27 percent between 2013 and 2014.<sup>560</sup>
- September 15, 2015 – E&E Publishing's *EnergyWire* reported on the potentially deadly risk of exposure to vapors from oil and gas field storage tanks, including deaths that were officially attributed to cardiac arrest, though inhalation of toxic gases and lack of oxygen played a role, as demonstrated in subsequent litigation. The reporter gave detail on the circumstances of several of the deaths, including that of a long-haul trucker who had heart disease and was diabetic, and whose death was classified as natural. "But he didn't suffer a heart attack that day, or a diabetic episode. Medical experts said he likely wouldn't have died outside the toxic atmosphere on the catwalk." A Denver cardiologist testified that "there was no other reason for him to have died that day."<sup>561</sup> (NIOSH has subsequently targeted outreach to medical examiners to improve their recognition of this hazard and potential cause of death; see above.)
- September 5, 2015 – In partnership with Rocky Mountain PBS I-News, *The Durango Herald* reported on the oil and gas industry's varied practices in their handling of silica sand with regard to worker protection. In 2012 the National Institute for Occupational Safety and Health issued an alert concerning workers at fracking sites being exposed to silica dust at levels that exceeded occupational exposure limits. Industry has resisted updates to the standards. The *Herald* report addressed technological and work practice controls to reduce exposure on the part of some companies. Still, authors wrote, silicosis "can hide for a decade before causing symptoms. No one knows how many oil and gas workers may have already been exposed."<sup>562</sup>
- June 29, 2015 – An investigation by the Center for Public Integrity (CPI) found that lung-damaging silica is not sufficiently regulated to prevent silicosis (which is incurable and has no effective treatment) or lung cancer in the workplace. Rules governing occupational exposure to silica dust are far outdated, and advocacy efforts to tighten them are four decades old. At particular risk, say the authors, are workers in oil and gas fields where silica sand is used in fracking operations. Citing research by NIOSH, the CPI team noted that nearly 80 percent of the air samples on the well pads were above the recommended exposure limit for silica dust.<sup>563</sup>

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<sup>560</sup> U.S. Department of Labor, Bureau of Labor Statistics (2015, September 17). *National census of fatal occupational injuries in 2014* (preliminary results). USDL-15-1789. Retrieved from <http://www.bls.gov/news.release/pdf/cfoi.pdf>

<sup>561</sup> Soraghan, B. (2015, September 14). SAFETY: How shale oil can kill. *E&E Publishing, LLC*. Retrieved from <http://www.eenews.net/stories/1060024589>

<sup>562</sup> Boiko-Weyrauch, A. (2015, September 5). Oil, gas industry responding to threat of worker lung disease. *Durango Herald*. Retrieved from <http://www.durangoherald.com/article/20150905/NEWS02/150909741/Oil-gas-industry-responding-to-threat-of-worker-lung-disease->

<sup>563</sup> Morris, J., Hopkins, J. S., & Jameel, M. (2015, June 30). Unequal risk: Slow-motion tragedy for American workers. *The Center for Public Integrity*. Retrieved from <http://www.publicintegrity.org/2015/06/29/17518/slow-motion-tragedy-american-workers>



- June 15, 2015 – *EnergyWire* examined issues surrounding exposure to crystalline silica from frack sand mining, which is a health concern to those living near mines and to those working in the industry. Families living near industrial sand mining reported that their health has been compromised by sand mine development and are concerned that companies are not properly monitoring their extraction sites. The article noted that OSHA is working on a new exposure rule for workers that the agency estimates would save nearly 700 lives and prevent 1,600 new cases of silicosis annually. The oil and gas industry is fighting the rule because of the cost associated with complying with a more stringent permissible exposure limit. Crispin Pierce, public health researcher at the University of Wisconsin in Eau Claire, is in the midst of a three-pronged research project to look at the industry's air effects. Among other findings, his project's air monitors around sand plants have found consistently finding higher readings than the Wisconsin Department of Natural Resources' reported regional values.<sup>564</sup>
- June 15, 2015 – In an update, NIOSH noted that silicosis death rates are rising again, reversing an earlier, decade-long decline. In the list of job tasks with known high silica exposures, the update named hydraulic fracturing of gas and oil wells. These results are particularly concerning in light of earlier research showing significant under-detection of silicosis among deceased workers with known exposure to silica dust.<sup>565</sup>
- June 13, 2015 – Reporting on North Dakota's fracking boom, the Center for Investigative Reporting found that the major oil companies have largely written the rules governing their own accountability for accidents. Deeply entrenched corporate practices and weak federal oversight, according to the report, have led to high injury and death rates and a shift of assigned responsibility to others. Using data from U.S. and Canadian regulators, the journalists verified 74 on-the-job deaths among workers in Bakken Shale drilling and fracking operations since 2006. The actual number of deaths is likely higher than currently reported because federal regulators do not have a systematic way to record oil- and gas-related deaths, and OSHA does not include certain fatalities, including those of independent contractors. The report concluded that there was too little oversight from OSHA, that laws to protect workers were outdated, and that there was a culture of self-regulation by the industry.<sup>566</sup>
- May 29, 2015 – The Centers for Disease Control and Prevention published statistics on work-related fatalities during the fracking boom. The occupational fatality rate among U.S. oil and gas industry extraction workers between 2003 and 2013 remained an average of seven times higher than among U.S. workers in general (25.1 versus 3.7 deaths per 100,000 workers per year). Within this 11-year period, the industry doubled the size of its workforce and increased drilling rigs by 71 percent. The number of occupational deaths

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<sup>564</sup> King, P. (2015, June 15). Frac sand towns question whether rules protect them against silica pollution. *EnergyWire*. Retrieved from <http://www.eenews.net/stories/1060020192>

<sup>565</sup> Mazurek, J. M., & Weissman, D. (2015, June 15). Silicosis update. *NIOSH Science Blog*. Retrieved from <http://blogs.cdc.gov/niosh-science-blog/2015/06/15/silicosis-update/>

<sup>566</sup> Gollan, J. (2015, June 13). In North Dakota's Bakken oil boom there will be blood. *Reveal; Center for Investigative Reporting*. Retrieved from <https://www.revealnews.org/article/in-north-dakotas-bakken-oil-boom-there-will-be-blood/>

increased 27.6 percent, with a total of 1,189 deaths, but it did not increase as much as the number of workers, resulting in an overall decrease in the fatality rate of 36.3 percent. Transportation accidents and contact with objects and equipment were the most frequent fatal events. Evidence suggests that the increased use of automated technologies on drilling rigs may be contributing to the decline in death rates.<sup>567</sup>

- April 22, 2015 – The AFL-CIO published data for job injuries, illnesses and deaths in a national and state-by-state profile of worker safety and health in the United States, presenting comparisons by state and industry. For the third year in a row, North Dakota had the highest on-the-job fatality rate in the nation: 14.9 deaths per 100,000 workers, a rate that is more than four times the national average, and which has more than doubled since 2007. The fatality rate in the mining and oil and gas extraction sector in North Dakota was 84.7 per 100,000, which is nearly seven times the national fatality rate of 12.4 per 100,000 in this industry.<sup>568, 569</sup>
- April 10, 2015 – In a study that was inclusive of fracking-based extraction but not specific to it, NIOSH researchers updated their investigation into the sudden deaths of nine oil and gas extraction workers found near hatches where hydrocarbons were stored. All nine victims died between 2010 and 2014 and were unobserved or working alone at the time of their deaths. The first report attributed the fatalities to “inhalation of volatile petroleum hydrocarbons.”<sup>570</sup> The update noted that when workers open hatches on production tanks, a plume of hydrocarbon gases and vapors can be rapidly released due to high internal pressure. Exposure to high concentrations of these low-molecular-weight hydrocarbons creates asphyxiation and explosive hazards and can have narcotic effects, resulting in disorientation, dizziness, and light-headedness. The authors cited reports of other sudden deaths following butane and propane inhalation, exposure to which can induce irregular heartbeat, insufficient oxygen supply, and respiratory depression.<sup>571</sup> As reported by the *Denver Post*, most of the death certificates listed natural causes or heart failure as the cause likely because medical examiners can easily miss signs of toxic inhalation during a routine autopsy. The nomadic nature of the industry presents obstacles to proper training in tank handling techniques.<sup>572</sup> NIOSH issued

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<sup>567</sup> Mason, K. L., Retzer, K. D., Hill, R., & Lincoln, J. M. (2015, May 29). Occupational fatalities during the oil and gas boom—United States, 2003-2013. *Morbidity and Mortality Weekly Report*, 64, 551-554. Retrieved from <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6420a4.htm>

<sup>568</sup> AFL-CIO Safety and Health Department, (2015, April 22). Death on the job: The toll of neglect. Retrieved from <http://www.aflcio.org/Issues/Job-Safety/Death-on-the-Job-Report>

<sup>569</sup> Kasperkevic, J. (2015, April 29). About 150 US workers are killed on the job every day – report. *Guardian*. Retrieved from <http://www.theguardian.com/us-news/2015/apr/29/north-dakota-deadliest-state-workers-third-year-running>

<sup>570</sup> NIOSH. (2015, March 15). Suspected inhalation fatalities involving workers during manual tank gauging, sampling, and fluid transfer operations on oil and gas well sites, 2010-2014. *CDC Workplace Safety & Health Topics*. Retrieved from [http://www.cdc.gov/niosh/topics/fog/data.html#\\_ftn1](http://www.cdc.gov/niosh/topics/fog/data.html#_ftn1)

<sup>571</sup> King, B., Esswein, E., Retzer, K., Snawder, J., Ridl, S., Breitenstein, M. Alexander-Scott, M., & Hill, R. (2015, April 10). *NIOSH Science Blog*, Centers for Disease Control. Retrieved from <http://blogs.cdc.gov/niosh-science-blog/2015/04/10/flowback-3/>

<sup>572</sup> Whaley, M. (2015, May 18). Toxic vapors suspected in deaths of three Colorado oil and gas workers. *Denver Post*. Retrieved from [http://www.denverpost.com/news/ci\\_28136543/colorado-oil-and-gas-workers-fell-victim-little](http://www.denverpost.com/news/ci_28136543/colorado-oil-and-gas-workers-fell-victim-little)

recommendations for worker protections, including respiratory protection training and engineering controls for remote gauging and venting.<sup>573</sup>

- February 15, 2015 – Burn injuries among North Dakota workers surged to more than 3,100 over the past five years as the area has become the epicenter of a massive drilling and fracking boom, as reported by the *Star Tribune*. Despite the flammability of Bakken crude oil and the danger of oil rig work, North Dakota has no burn centers, and burn victims must be transported out of state, typically to the Minneapolis-St. Paul area some 600 miles away. The article also covered the severe, debilitating, costly, and sometimes fatal aspects of these occupational injuries.<sup>574</sup>
- February 13, 2015 – NIOSH reported that while silicosis death rates declined between 2001 and 2010, silicosis deaths were still occurring among young persons aged 15 to 44 years old, indicating extremely high exposures to respirable silica dust. Among emerging new settings that put workers at risk for silicosis, the authors named oil and gas extraction industry workers.<sup>575</sup>
- January 14, 2015 – The *Charleston Gazette-Mail* reported that, due to an increase in workplace deaths that has accompanied the boom in natural gas drilling and production from the Marcellus Shale fields in Northern West Virginia, the Governor there has called for a study aimed at reversing that trend. “Between 2009 and 2013, as the industry boomed in the Marcellus region, 15 natural gas workers died on the job in West Virginia, according to the federal data. During the previous five-year period, from 2004 to 2008, three workers died in West Virginia’s oil and gas industry, according to the [U.S. Bureau of Labor Statistics].”<sup>576</sup>
- January 12, 2015 – Oil and gas production employs less than one percent of the U.S. workforce, but in the past five years it has had more than ten percent of all workplace fatalities from fires and explosions. A review by *EnergyWire* of federal labor statistics last year found the industry had more deaths from fires and explosions than any other private industry. The only “industry” with more fire and explosion fatalities than oil and gas was firefighting, the report stated. These statistics are inclusive of deaths related to fracking operations but are not specific to them.<sup>577</sup>

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<sup>573</sup> Associated Press. (2015, May 18). 9 oil well deaths lead to warning about inhaling chemicals. *Times-Call*. Retrieved from [http://www.timescall.com/news/nationworldnews/ci\\_28138297/9-oil-well-deaths-lead-warning-about-inhaling](http://www.timescall.com/news/nationworldnews/ci_28138297/9-oil-well-deaths-lead-warning-about-inhaling)

<sup>574</sup> Rao, M. (2015, February 15). Twin Cities hospitals are front line in treating Bakken burn victims. *StarTribune.com*. Retrieved from <http://www.startribune.com/lifestyle/health/291967611.html?page=all&prepage=1&c=y#continue>

<sup>575</sup> Bang, K. M., Mazurek, J. M., Wood, J. M., White, G. E., Hendricks, S. A., & Weston, A. (2015), Silicosis mortality trends and new exposures to respirable crystalline silica – United States, 2001-2010. *Morbidity and Mortality Weekly Report*, 64(05), 117-120. Retrieved from <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm6405a1.htm>

<sup>576</sup> Ward, K. (2015, January 14). Tomblin calls for study of increased deaths from gas-drilling boom. *Charleston Gazette*. Retrieved from [https://www.wvgazette.com/news/politics/tomblin-calls-for-study-of-increased-deaths-from-gas-drilling/article\\_21d6342f-c5dd-54ee-bd91-534ece13373a.html](https://www.wvgazette.com/news/politics/tomblin-calls-for-study-of-increased-deaths-from-gas-drilling/article_21d6342f-c5dd-54ee-bd91-534ece13373a.html)

<sup>577</sup> Soraghan, M. (2015, January 12). At least 16 drilling industry workers died in fires, explosions last year. *EnergyWire*. Retrieved from <http://www.eenews.net/stories/1060011452>

- December 26, 2014 – A report in the *Houston Chronicle* illustrated the difficulties oil and gas workers encounter when injured on the job. In one case a worker fell from a rig, injuring his head. Supervisors did not record the accident. After he became too ill to work, he was shifted to other jobs and soon after, sent home. His daughter filed a Worker’s Compensation claim, which was denied for “late reporting, no knowledge of injury by employer and no medical reports.” The article noted that oilfield injuries are generally undercounted nationally. These include injuries related to drilling and fracking operations as well as those linked to other techniques of extraction.<sup>578</sup>
- December 4, 2014 – Benzene, a naturally occurring component of crude oil and natural gas, is a known carcinogen, with no known threshold of safety. Although the American Petroleum Institute in 1948 stated that “the only absolutely safe concentration ... is zero,” the organization since then undertook an intensive campaign to combat strict exposure limits. An investigation by the Center for Public Integrity found that, “[f]or decades, the petrochemical industry spent millions on science seeking to minimize the dangers of benzene.... Taken together, the documents—put in context by interviews with dozens of lawyers, scientists, academics, regulators and industry representatives—depict a ‘research strategy’ built on dubious motives, close corporate oversight and painstaking public relations.”<sup>579</sup>
- December, 2014 – In a report intended to inform employers and workers about the known hazards that result from hydraulic fracturing and flowback operations, OSHA noted that there is no publicly available worker injury, illness, or fatality data specific for fracking or flowback operations. At the same time, more workers are exposed to fracking- and flowback-related hazards due to the huge increase in the numbers of these operations over the past ten years. “In light of this, OSHA has determined that additional information concerning hydraulic fracturing and flowback operations hazards should be provided to educate and protect workers.”<sup>580</sup>
- November 11, 2014 – University of Wisconsin toxicologist Crispin Pierce documented super-fine dust drifting from facilities that process silica sand for fracking operations. Pierce and his team detected silica dust in ambient air near frac sand operations at levels that exceed EPA air quality standards by a factor of four. Occupational exposure to respirable crystalline silica is linked in adult workers to silicosis, lung cancer, and pulmonary tuberculosis. Health threats to the general public from frac sand-related air pollution have not yet been studied directly. One of the first investigations of silica dust levels in the community environment, the Wisconsin study will appear next year in the

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<sup>578</sup> Olsen, L. (2014, December 16). Many oilfield injuries go unreported. *Houston Chronicle*. Retrieved from <http://www.houstonchronicle.com/news/houston-texas/houston/article/Many-oilfield-injuries-go-unreported-5980350.php>

<sup>579</sup> Lombardi, K. (2014, December 4). Benzene and worker cancers: ‘An American tragedy.’ The Center for Public Integrity. Retrieved from <http://www.publicintegrity.org/2014/12/04/16320/benzene-and-worker-cancers-american-tragedy>

<sup>580</sup> U.S. Department of Labor, Occupational Safety and Health Administration. (2014). Hydraulic fracturing and flowback hazards other than respirable silica. OSHA 3763-12 2014.

*Journal of Environmental Health*.<sup>581</sup> (See entry for November 6, 2015 in Sand mining and processing.)

- November 11, 2014 – A high-pressure water line ruptured, killing one worker and seriously injuring two others during the hydraulic fracturing of an oil well in Weld County, Colorado.<sup>582</sup>
- October 6, 2014 – Toxicologist Peter Thorne, chair of University of Iowa's Department of Occupational and Environmental Health, warned the Winneshiek County Board of Supervisors about potential community impacts and cancer risks of silica exposure from sand used for fracking operations. Thorne's ongoing investigation, which involves air sampling, risk assessments, and inhalation toxicology studies, focuses on the public health hazards of mining, processing, and storing sand. His team has documented spikes in silica particulate matter related to the transport of the silica sand by rail. The study aims to determine if mining poses an "unacceptable exposure" to the public and quantify the level of risk. For silica-exposed workers, NIOSH continues to identify needed health protections. Thorne noted, "Workers handling materials should be using respirators, but most are not."<sup>583</sup>
- September 25, 2014 – The Civil Society Institute's Boston Action Research, in cooperation with Environmental Working Group and Midwest Environmental Advocates, issued a report on the hazards of silica mining. The report noted that frac sand mining is expanding rapidly in the United States and poses a little-understood threat to public health, the environment, and local economies. Given the pace of the drilling and fracking boom, silica extraction could spread to a dozen other states with untapped or largely untapped sand deposits, including Illinois, Maine, Massachusetts, Michigan, Missouri, New York, North Carolina, South Carolina, Pennsylvania, Tennessee, Vermont, and Virginia. The *International Business Times* published a summary of the findings.<sup>584, 585</sup>
- August 29, 2014 – In a peer-reviewed study, NIOSH partnered with oil and gas operators and service companies to evaluate worker exposures to, and internal uptake of, volatile organic chemicals at six sites in Colorado and Wyoming where wells were being

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<sup>581</sup> Kremer, R. (2014, November 11). High levels of super-fine dust are detected around Wisconsin frac sand mines. *Wisconsin Public Radio*. Retrieved from [http://www.wpr.org/high-levels-super-fine-dust-are-detected-around-wisconsin-frac-sand-](http://www.wpr.org/high-levels-super-fine-dust-are-detected-around-wisconsin-frac-sand-mines?utm_content=buffer8947f&utm_medium=social&utm_source=facebook.com&utm_campaign=buffer)

mines?utm\_content=buffer8947f&utm\_medium=social&utm\_source=facebook.com&utm\_campaign=buffer

<sup>582</sup> Paul, J. (2014, November 11). Brighton man ID'd as victim in fatal Weld County fracking blast. *The Denver Post*. Retrieved from [http://www.denverpost.com/news/ci\\_26937782/brighton-man-idd-victim-fatal-weld-county-fracking?source=pkg](http://www.denverpost.com/news/ci_26937782/brighton-man-idd-victim-fatal-weld-county-fracking?source=pkg)

<sup>583</sup> Strandberg, S. (2014, October 6). U of I researcher informs supervisors about frac-sand impact. *Decorah Newspapers*. Retrieved from <http://www.decorahnewspapers.com/Content/Home/Home/Article/U-of-I-researcher-informs-supervisors-about-frac-sand-impact/-2/-2/35735>

<sup>584</sup> Chapman, E., Hopkins, L., Jasset, A., Sheldon, S., & Smith, G. (2014, September 25). Communities at risk: Frac sand mining in the Upper Midwest—A report by Boston Action Research (a project of Civil Society Institute). Retrieved from <http://216.30.191.148/fracsandmining/> and [www.bit.ly/fracsandmining](http://www.bit.ly/fracsandmining)

<sup>585</sup> Gallucci, M. (2014, September 25). US oil & gas fracking boom could drive silica sand mining operations in 12 more states, environmental groups say. *International Business Times*. Retrieved from <http://www.ibtimes.com/us-oil-gas-fracking-boom-could-drive-silica-sand-mining-operations-12-more-states-1695246>

prepared for production. The study found benzene in the urine of well pad workers. Benzene is “naturally present in flowback fluids and the time spent working around flowback and production tanks ... appears to be the primary risk factor for inhalation exposures.” In some cases, airborne concentrations of benzene exceeded the NIOSH Recommended Exposure Limit concentrations and, in a few instances, the American Conference of Governmental Industrial Hygienists’ Threshold Limit Value, “when workers performed work tasks near a point source for benzene emissions.”<sup>586</sup>

- July 29, 2014 – As part of an investigation into the health impacts of drilling and fracking on animal health, veterinarian Michelle Bamberger and Cornell biochemist Robert Oswald, published an interview with a twenty-year oil and gas industry worker about his experiences and worker safety. His account included injuries, 16-hour workdays, fatigue, exposure to chemicals, and inadequate health and safety training. “No one out there tells you about stuff that has latency. That is the last thing they are going to do is tell you that something that you are handling will take you out in 20 years or 10 years or cause you some kind of ailment, or you can potentially drag this home to your family.”<sup>587</sup>
- July 14, 2014 – As part of an analysis of safety and research needs associated with drilling and fracking, researchers at the Colorado School of Public Health and the College of Health Sciences at the University of Wyoming documented high injury and on-the-job mortality rates among gas and oilfield workers. The occupational fatality rate was 2.5 times higher than that of the construction industry and seven times higher than that of general industry. By contrast, injury rates were lower than the construction industry, suggesting that injuries are underreported. Researchers documented crystalline silica levels above occupational health standards and identified the existence of other hazards, including particulate matter, benzene, noise, and radiation. The team called for exposure assessments for both chemical hazards and physical hazards that lead to occupational illness (noise, radioactivity); screening and surveillance systems to assess incidence and prevalence of occupational illness; industry/academic collaboration to conduct occupational epidemiologic studies; and assessment of the effectiveness of industry interventions to reduce exposures.<sup>588</sup>
- July 2014 – The British labor journal *Hazards* identified health concerns in the drilling and fracking industry: increased rate of death on the job, toxic releases, silica exposure, and exposure to hydrocarbons and endocrine disruptors. The union that organizes the construction, rig, and transport workers, on which fracking would rely, agreed at its July 2014 national conference to lobby for a moratorium on fracking because “[d]elegates want union members to be made aware of the dangers of fracking and be advised not to

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<sup>586</sup> Esswein, E., Snawder, J., King, B., Breitenstein, M., Alexander-Scott, M., & Kiefer, M. (2014). Evaluation of some potential chemical risks during flowback operations in unconventional oil and gas extraction: Preliminary results. *Journal of Occupational and Environmental Hygiene*, 11, D174-0184.

<sup>587</sup> Bamberger, M., & Oswald, R. (2015). The shale gas revolution from the viewpoint of a former industry insider. *New Solutions: A Journal of Environmental and Occupational Health Policy*, 24(4), 585-600. Advance online publication. doi: 10.2190/NS.EOV.1

<sup>588</sup> Witter, R. Z., Tenney, L., Clark, S., & Newman, L. S. (2014). Occupational exposures in the oil and gas extraction industry: State of the science and research recommendations. *American Journal of Industrial Medicine*, 57(7), 847-856. doi: 10.1002/ajim.22316

work on fracking sites.”<sup>589</sup>

- June 29, 2014, and August 31, 2014 – An initial report and follow-up analysis in *The Columbus Dispatch* examined fire hazards at well pads. In one notable case, malfunctioning hydraulic tubing allowed a well pad fire in Monroe County, Ohio to spread rapidly, prompting evacuations. Local firefighters had neither the correct equipment nor did they know the chemicals they were trying to extinguish. One firefighter was treated for smoke inhalation.<sup>590, 591</sup>
- May 19, 2014 – Underscoring the dangerous nature of chemicals used in fracking operations, NIOSH reported that at least four gasfield workers have died since 2010 from acute chemical exposures during flowback operations and warned that flowback operations can “result in elevated concentrations of volatile hydrocarbons in the work environment that could be acute exposure hazards.” The agency further noted that such volatile hydrocarbons “can affect the eyes, breathing, and the nervous system and at high concentrations may also affect the heart causing abnormal rhythms.”<sup>592, 593</sup>
- May 16, 2013 – A NIOSH study revealed that worker exposure to crystalline silica dust from sand used in fracking operations exceeded “relevant occupational health criteria” at all eleven tested sites, and the magnitude of some exposures exceeded NIOSH limits by a factor of 10 or more. “[P]ersonal respiratory protection alone is not sufficient to adequately protect against workplace exposures.” Inhalation of crystalline silica can cause incurable silicosis, lung cancer, chronic obstructive pulmonary disease, kidney disease and autoimmune diseases.<sup>594</sup> Although community exposures distant from mines are possible, there are no federal or state standards for silica in ambient air.<sup>595</sup>
- May 8, 2014 – A report by the AFL-CIO found that the fracking boom has made North Dakota the most dangerous state for U.S. workers—with a fatality rate five times higher than the national average—and that North Dakota’s fatality rate has doubled since 2007. The AFL-CIO called North Dakota “an exceptionally dangerous and deadly place to

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<sup>589</sup> O’Neill, R. (editor). (2014). Chemicals, dust and deaths and the new rush for oil and gas. *Hazards Magazine*. Special Online Report. Retrieved from <http://www.hazards.org/oil/fracking.htm#top>

<sup>590</sup> Richards, J. S. (2014, June 29). Glitch sparks smoky fire at gas well. *Columbus Dispatch*. Retrieved from <http://www.dispatch.com/content/stories/local/2014/06/29/glitchsparks-smoky-fire-at-gas-well.html>

<sup>591</sup> Arenschiold, L. (2014, August 31). Fracking fire points out failings. *Columbus Dispatch*. Retrieved from <http://www.dispatch.com/content/stories/local/2014/06/29/glitchsparks-smoky-fire-at-gas-well.html>

<sup>592</sup> Snawder, J., Esswein, E., King, B., Breitenstein, M., Alexander-Scott, M., Retzer, K., . . . Hill, R. (2014, May 19). Reports of worker fatalities during flowback operations [Web log post]. *NIOSH Science Blog*. Retrieved from <http://blogs.cdc.gov/niosh-science-blog/2014/05/19/flowback/>

<sup>593</sup> Iafolla, R. (2014, May 20). Four fatalities linked to used fracking fluid exposure during ‘flowback,’ NIOSH reports. *Bloomberg BNA*. Retrieved from <http://www.bna.com/four-fatalities-linked-n17179890610/>

<sup>594</sup> Esswein, E. J., Breitenstein, M., Snawder, J., Kiefer, M., & Sieber, W. K. (2013). Occupational exposures to respirable crystalline silica during hydraulic fracturing. *Journal of Occupational and Environmental Hygiene*, 10(7), 347-356. doi: 10.1080/15459624.2013.788352

<sup>595</sup> University of Iowa Environmental Health Sciences Research Center. (2012). Exposure assessment and outreach to engage the public on health risks from frac sand mining. Retrieved from <http://cph.uiowa.edu/ehsrc/fracsand.html>

work.” U.S. Secretary of Labor Thomas E. Perez called the rising rate of workplace deaths suffered in the oil and gas sector “unacceptable.”<sup>596</sup>

- April 24, 2014 – A University of Texas San Antonio report commissioned by the Methodist Healthcare Ministries found that many oil and gas field workers in the Eagle Ford Shale are uninsured or underinsured and that “the most noticeable health impacts so far are work-related illnesses and injuries: heat exhaustion, dehydration, sleep deprivation, exposure to oil and gas spills and accidents.” The study also noted that oil and gas production has put strain on healthcare facilities.<sup>597</sup>
- April 10, 2014 – West Virginia University researcher Michael McCawley reported that some of the nation’s highest rates of silicosis are in heavily drilled areas within the Northern Panhandle of West Virginia and southwestern Pennsylvania. A disease that hardens the lungs through inflammation and development of scar tissue, silicosis is entirely attributable to exposure to silica dust, a known occupational hazard at drilling and fracking operations. Two years earlier, OSHA and NIOSH issued a joint “Hazard Alert” to warn fracking workers of the health hazards of exposure to silica dust, including silicosis.<sup>598</sup>
- February 25, 2014 – A year-long investigation by the *Houston Chronicle* found that fracking jobs are deadly, with high fatality rates and high rates of serious injury. Within just one year in Texas, 65 oil and gas workers died, 79 lost limbs, 82 were crushed, 92 suffered burns and 675 broke bones. From 2007 to 2012, at least 664 U.S. workers were killed in oil and gas fields.<sup>599, 600</sup>
- December 27, 2013 – National Public Radio (NPR) reported spiking rates of fatalities related to oil and gas drilling operations, which had increased more than 100 percent since 2009. NPR noted that in the previous year, 138 workers were killed on the job, making the fatality rate among oil and gas workers nearly eight times higher than the average rate of 3.2 deaths for every 100,000 workers across all industries.<sup>601</sup>

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<sup>596</sup> Picchi, A. (2014, May 8). The most dangerous U.S. state for workers. *CBS News*. Retrieved from <http://www.cbsnews.com/news/the-most-dangerous-us-state-for-workers/>

<sup>597</sup> Ghahremani, Y. (2014, April 24). Fractured Healthcare: Pumping Resources Back into the Eagle For Shale Communities/Executive Summary: Methodist Healthcare Ministries and Center for Community and Business Research at the University of Texas San Antonio. Retrieved from <http://www.joomag.com/en/newsstand/fractured-healthcare-pumping-resources-back-into-the-eagle-ford-shale-communities-apr-2014/0368470001398347080>

<sup>598</sup> Hicks, I. (2014, April 10). Gas workers risk silica exposure. *The Intelligencer, Wheeling News-Register*. Retrieved from <http://www.news-register.net/page/content.detail/id/598589/Gas-Workers-at-Risk-Of-Silica-Ex---.html>

<sup>599</sup> Olsen, L. (2014, February 22). Houston Chronicle exclusive: Drilling boom, deadly legacy. Retrieved from <http://www.houstonchronicle.com/news/special-reports/article/Houston-Chronicle-exclusive-Drilling-boom-5259311.php#0>

<sup>600</sup> Hsieh, S. (2014, February 25). Why are so many workers dying in oil fields? Retrieved from <http://www.thenation.com/blog/178523/why-are-so-many-workers-dying-oil-fields>

<sup>601</sup> Schneider, A., & Geewax, M. (2013, December 27). On-the-job deaths spiking as oil drilling quickly expands. Retrieved from <http://www.npr.org/2013/12/27/250807226/on-the-job-deaths-spiking-as-oil-drilling-quickly-expands>



- October 30, 2012 – In a policy statement, the American Public Health Association (APHA) asserted that, high volume horizontal hydraulic fracturing (HVHF) “poses potential risks to public health and the environment, including groundwater and surface water contamination, climate change, air pollution, and worker health.” The statement also noted that the public health perspective has been inadequately represented in policy processes related to HVHF.<sup>602</sup> The policy statement added:

[H]ydraulic fracturing workers are potentially exposed to inhalation health hazards from dust containing silica. There may also be impacts on workers and communities affected by the vastly increased production and transport of sand for HVHF.

Inhalation of fine dusts of respirable crystalline silica can cause silicosis. Crystalline silica has also been determined to be an occupational lung carcinogen.

- 2005 – A researcher at Stanford University examined hazards associated with oil and gas extraction from exposure to radiation and determined that inhalation of high levels of radon gas is a serious concern to workers and those living nearby. Because the boiling point of radon lies between those of propane and ethane, gaseous radon (<sup>222</sup>Rn) will concentrate in ethane and propane fractions. “Elevated Rn activity concentration values have been measured at several processing plant sites.... It is well known that the radiological impact of the oil and gas-extracting and processing industry is not negligible.”<sup>603</sup>
- May 9, 2003 – A New York Medical College study re-evaluated the chest X-rays of patients with exposure to silica who died from various respiratory problems and found that more than eight percent had undiagnosed silicosis. The study suggested that occupational lung disease may be undercounted in high-risk occupations. The authors of this study said that improved OSHA standards, with ongoing exposure monitoring and medical surveillance, would significantly improve the recognition of cases and justify more stringent preventive measures to reduce exposure. They further noted that practitioners need skills in taking an occupational exposure history. Although ten years have passed since this study was published, both recommendations have yet to be implemented.<sup>604</sup>

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<sup>602</sup> American Public Health Association. (2012, October 30). The environmental and occupational health impacts of high-volume hydraulic fracturing of unconventional gas reserves. Retrieved from <http://www.apha.org/advocacy/policy/policysearch/default.htm?id=1439>

<sup>603</sup> Steinhäusler, F. (2005). Radiological impact on man and the environment from the oil and gas industry: Risk assessment for the critical group. *Nato Science Series: IV: Earth and Environmental Sciences*. doi: 10.1007/1-4020-2378-2\_19. [http://rd.springer.com/chapter/10.1007/1-4020-2378-2\\_19](http://rd.springer.com/chapter/10.1007/1-4020-2378-2_19)

<sup>604</sup> Goodwin, S. S., Stanbury, M., Wang, M.-L., Silbergeld, E., & Parker, J. E. (2003). Previously undetected silicosis in New Jersey decedents. *American Journal of Industrial Medicine*, 44, 304-11. doi: 10.1002/ajim.10260

## Public health effects, measured directly

*By several measures, evidence for fracking-related health problems has emerged across the United States and Canada. Studies of birth outcomes in regions of intensive unconventional oil and gas extraction continue to point to reproductive risks, including low birth weight and preterm births. In Oklahoma and Colorado, birth defects were elevated among infants whose mothers lived near drilling and fracking sites while pregnant.*

*As shown by multiple studies in Pennsylvania, as the number of gas wells increase in a community, so do rates of hospitalization, and community members experience sleep disturbance, headache, throat irritation, stress/anxiety, cough, shortness of breath, sinus problems, fatigue, wheezing, and nausea. Also in Pennsylvania, hospitalizations for pneumonia among the elderly are elevated in areas of fracking activity, and one study found significantly elevated rates of bladder and thyroid cancers. In Colorado, children and young adults with leukemia were 4.3 times more likely to live in an area dense with oil and gas wells. Drilling and fracking operations in multiple states are variously correlated with increased rates of asthma; increased hospitalizations for pneumonia and kidney, bladder, and skin problems; high blood pressure and signs of cardiovascular disease; elevated motor vehicle fatalities; symptoms of depression; ambulance runs and emergency room visits; and incidence of sexually transmitted diseases.*

*Benzene levels in ambient air surrounding drilling and fracking operations are sufficient to elevate risks for future cancers in both workers and nearby residents, according to studies. Animal studies show numerous threats to fertility and reproductive success from exposure to various concentrations of oil and gas chemicals at levels representative of those found in drinking water. A recent study found that 43 chemicals used in drilling and fracking operations are classified as known or presumed human reproductive toxicants, while 31 others are suspected human reproductive toxicants. An earlier study identified two dozen chemicals commonly used in fracking operations as endocrine disruptors that can variously disrupt organ systems, lower sperm counts, and cause reproductive harm at realistically expected exposure levels.*

- January 21, 2019 – Increased hospitalizations for diseases of the genitourinary system, such as urinary tract infections, kidney infections, and kidney stones, were “strongly and positively associated with cumulative [unconventional natural gas] well density” in Pennsylvania.<sup>605</sup> The strongest association for the genitourinary hospitalization rates was for women aged 20 to 64, particularly for kidney infections, stones in the ureter, and urinary tract infections. The researchers compared yearly hospitalization rates for each of Pennsylvania’s 67 counties with the number of new fracking wells drilled, the total number of wells, and the density of wells by land area for each county by year, from 2003-2014. Noting that hospitalizations, in contrast with outpatient physician visits, reflect acute illness or serious exacerbations of chronic disease, the research team pointed

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<sup>605</sup> Denham, A., Willis, M., Zavez, A., & Hill, E. (2019). Unconventional natural gas development and hospitalizations: evidence from Pennsylvania, United States, 2003-2014. *Public Health*, 168, 17-25. doi: 10.1016/j.puhe.2018.11.020

out that these same health problems addressed in an outpatient setting, or not addressed at all, were likely also rising but would not have been counted in this study. The findings also revealed a link between cumulative gas well exposure measures and hospitalization rates for skin problems, particularly among men aged 20 to 64.

- December 12, 2018 – University of Oklahoma public health scientists found a significantly increased prevalence of neural tube defects among children whose birth residence was located within two miles of a drilling and fracking site, compared to those which were not.<sup>606</sup> The researchers examined records of all 476,600 singleton births and congenital anomalies in Oklahoma from 1997 through 2009, together with historical location and production data on active natural gas wells for each year of the study. No stillbirths were included in this study. Hence, as the researchers note, the link they found would likely be an underestimate “if natural gas activity is related to severe anomalies with high prenatal mortality.”
- December 6, 2018 – Early signs of cardiovascular disease—including high blood pressure, changes in the stiffness of blood vessels, and markers of inflammation—occurred more often in people who live in communities with more intense oil and gas development, according to a study of 97 adults living in northeastern Colorado between October 2015 and May 2016.<sup>607</sup> Artery stiffness, as measured by augmentation index, was highest among people living in areas with the greatest drilling and fracking activity, as was systolic and diastolic blood pressure (for those not taking prescription medications). This was the first study to evaluate, with direct measurements, indicators of cardiovascular disease and the intensity of oil and gas activity. The results are consistent with previous research showing increased rates of cardiology inpatient hospital admission in these areas.
- August 28, 2018 – The top 10 oil and gas producing counties in Colorado had higher truck accident rates than the remaining 54 counties in an analysis by Colorado School of Public Health researchers. Researchers also performed an additional geospatial study technique called a “grid level analysis” using the Colorado Oil and Gas information System (COGIS), census population information, and home locations. These results showed that grid cells with more homes and/or wells were associated with more truck accidents, as well as with more multi-vehicle truck accidents with an injury.<sup>608</sup>
- August 13, 2018 – Babies in Pennsylvania whose mothers lived near at least one gas well during their pregnancies were at higher risk for adverse birth outcomes, according to a study published in the *Journal of Health Economics*. This investigation examined state-

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<sup>606</sup> Janitz, A. E., Dao, H. D., Campbell, J. E., Stoner, J. A., & Peck, J. D. (2019). The association between natural gas well activity and specific congenital anomalies in Oklahoma, 1997–2009. *Environment International*, 122, 381–388. Advance online publication. doi: 10.1016/j.envint.2018.12.011

<sup>607</sup> McKenzie, L. M., Crooks, J., Peel, J. L., Blair, B. D., Brindley, S., Allshouse, W. B., . . . Adgate, J. L. (2019). Relationships between indicators of cardiovascular disease and intensity of oil and natural gas activity in Northeastern Colorado. *Environmental Research*, 170, 56–64. doi: 10.1016/j.envres.2018.12.004

<sup>608</sup> Blair, B. D., Hughes, J., Allshouse, W. B., McKenzie, L., & Adgate, J. L. (2018). Truck and multivehicle truck accidents with injuries near Colorado oil and gas operations. *International Journal of Environmental Research and Public Health*, 15, 1861. doi: 10.3390/ijerph15091861

based data on the locations of 2,459 natural gas wells drilled between 2006 and 2010 together with restricted-access birth and mortality data for the years 2003–2010.<sup>609</sup> Mothers living within 2.5 kilometers (1.5 miles) of gas wells gave birth to infants with increased incidence of low birth weight and small for gestational age (SGA). SGA generally increases with exposure to environmental pollution and helps determine immediate health care needs, as well as predicting long-term adverse health outcomes. In addition, the study found term birth weight for these infants was lower on average, and the prevalence of APGAR scores less than eight was increased by 26 percent. APGAR scores are used to evaluate the health of infants immediately after birth. This study builds on growing evidence that air pollution from shale gas development damages infant health and stands out for thoroughly controlling for predictors of infant health and for estimating the extensive and intensive margins of drillings. Within the intensive margin (which includes an estimation of the impact of well density), one additional well was associated with a seven percent increase in low birth weight, a five gram reduction in term birth weight, and a three percent increase in premature birth. Each of these adverse outcomes carries high associated medical costs. The author conservatively estimated the added cost associated with one low birth weight infant to be \$96,500 in the first year alone, not counting any loss of parent income. The author noted that these impacts are “likely to persist throughout these children’s lives.”

- August 10, 2018 – A study of Pennsylvania counties focusing on the period 2003–2012 found that counties with fracking activities have higher rates of gonorrhea and chlamydia infections (up 7.8 percent and 2.6 percent, respectively), as well as a 19.7 percent higher rate of prostitution-related arrests.<sup>610</sup> Authors found no evidence that confounding factors such as opioid prescription rates, viral hepatitis deaths, or drug abuse arrests influenced these results. These findings provide “strong evidence that unconventional or shale gas development poses significant risks to public health and that unconventional or shale gas development has policy implications beyond the economic and environmental impacts often cited.”
- July 28, 2018 – Road fatalities in the Permian Basin region of west Texas have risen and fallen with the price of oil, according to an investigative piece in *Bloomberg* using New York Mercantile Exchange and Texas Department of Transportation data.<sup>611</sup> Interviewees in the article pointed to inexperienced and exhausted drivers, sinkholes, oversized trucks on roads not designed for the amount of traffic they now carry, and other factors as reasons for the ongoing fatalities.
- July 27, 2018 – In this study of almost 5,000 Pennsylvanians, a team of medical and public health scientists found a link between living closer to more and bigger

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<sup>609</sup> Hill, E. (2018). Shale gas development and infant health: Evidence from Pennsylvania. *Journal of Health Economics*, 61, 134–150. doi: 10.1016/j.jhealeco.2018.07.004

<sup>610</sup> Beleche, T., & Cintina, I. (2018). Fracking and risky behaviors: Evidence from Pennsylvania. *Economics and Human Biology*, 31, 69–82. doi: 10.1016/j.ehb.2018.08.001

<sup>611</sup> Collins, R., & Adams-Heard, R. (2018, July 28). ‘Death Highway’ is where oil prices, truck fatalities intersect. *Bloomberg*. Retrieved from <https://www.bloomberg.com/news/articles/2018-07-28/-death-highway-is-where-oil-prices-truck-fatalities-intersect>

unconventional shale gas wells and increased symptoms of depression. This is the first epidemiologic study to address a mental health outcome with regard to proximity to fracking and related operations. The researchers combined information from a mailed questionnaire, electronic health record data, and residential proximity to more and bigger wells, using well data from three agencies. Size of wells was ascertained by combining data on total well depth and volume of natural gas produced. Researchers concluded that drilling and fracking activities “may be associated with adverse mental health in Pennsylvania” and called for including potential mental health consequences in future risk-benefit calculations.<sup>612</sup>

- June 21, 2018 – Using individual inpatient data for the whole state of Pennsylvania from 2003 through 2014, researchers found consistent associations between childhood asthma hospitalizations and nearby drilling and fracking activity. When they compared unexposed children to children in the top third of patients exposed to shale gas drilling, the research team found that, during the same calendar quarter a gas well was drilled, the odds of children and adolescents being hospitalized for asthma increased by 25 percent. If there was ever a well drilled within a zip code, the odds of these pediatric asthma-related hospitalizations increased by 19 percent. This finding demonstrates that the increased risk remains for years after wells are drilled.<sup>613</sup> This study is notable because it is the first to control for 180 pre-existing respiratory health risks. Researchers also considered specific air emissions from drilling and fracking sites. They found that increased levels of 2,2,4-trimethylpentane, carbon dioxide, formaldehyde, nitrous oxide, volatile organic compounds (VOCs), and x-hexane were associated with increased risks of pediatric asthma hospitalizations across age groups, as well as links for younger children to additional pollutants.
- May 21, 2018 – Using the most stringent classification within and across countries internationally, researchers examined reproductive toxicity among chemicals used in drilling and fracking operations for oil and gas. They found that 43 chemicals are classified as known or presumed human reproductive toxicants, while 31 others are suspected human reproductive toxicants. The team, which included Yale School of Medicine and School Public of Health researchers, further analyzed the 43 reproductive toxicants for their carcinogenic and mutagenic properties and found that seven reproductive toxicants doubled as carcinogens and mutagens. They are potassium dichromate, cadmium, benzene, ethylene oxide, nickel sulfate, N,N-dimethylformamide, and lead. Of these, benzene and lead are found in both fracking fluid and in fracking wastewater. Researchers noted that their study was limited to 157 chemicals previously identified as having evidence of reproductive toxicity, which is only a fraction of the more than 1000 chemicals identified as being present in fracking fluid, fracking wastewater, and fracking-related air emissions. They recommended that their framework

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<sup>612</sup> Casey, J. A., Wilcox, H. C., Hirsch, A. G., Pollak, J., & Schwartz, B.S. (2018). Associations of unconventional natural gas development with depression symptoms and disordered sleep in Pennsylvania. *Scientific Reports*, 8. doi: 10.1038/s41598-018-29747-2

<sup>613</sup> Willis, M. D., Jusko, T. A., Halterman, J. S., & Hill, E. L. (2018). Unconventional natural gas development and pediatric asthma hospitalizations in Pennsylvania. *Environmental Research*, 166, 402-408. doi: 10.1016/j.envres.2018.06.022

be extended to all those chemicals.<sup>614</sup> (See also entry for January 6, 2016 in Water Contamination.)

- May 1, 2018 – In a laboratory study, prenatal exposure to fracking-related chemicals triggered immune problems in mice, especially females. All three immune system illnesses tested—a house dust mite-induced allergic disease, influenza A virus, and a disease similar to multiple sclerosis—were impaired in mice exposed in the womb to a mixture of fracking chemicals.<sup>615</sup> Using a chemical mixture “laced with chemicals at levels similar to those found in groundwater near fracking sites” and already demonstrated to have harmful developmental and reproductive effects, the researchers found sex-linked effects.<sup>616</sup> The exposed female mice showed more severe damage to their immune systems and ability to resist disease. In addition, the multiple sclerosis-like disease, experimental autoimmune encephalomyelitis, developed earlier and more severely in female mice as compared to male mice. Authors concluded, “These observations suggest that developmental exposure to complex mixtures of water contaminants, such as those derived from [drilling and fracking] operations, could contribute to immune dysregulation and disease later in life.”
- March 23, 2018 – Yale University public health scientists investigated possible connections between shale gas drilling and sexually transmitted diseases in Ohio. They found that, compared to counties with no shale gas activity, counties with high activity had 21 percent increased rates of chlamydia and 19 percent increased rates of gonorrhea.<sup>617</sup> They classified all 88 counties in the state as having none, low, and high shale gas activity in each year from 2000 through 2016, using Ohio Department of Natural Resources data. Their findings showed magnitude of effect for the association with gonorrhea that is similar to a prior analysis, adding strength to observed associations. Speaking to the *Columbus Dispatch*, the lead author noted, “Although there has been a decrease in new permits in recent years, [sexually transmitted infection] rates continue to climb because once a disease is introduced... it can be exchanged within the communities even after the workers leave.”<sup>618</sup>

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<sup>614</sup> Inayat-Hussain, S. H., Fukumura, M., Muiz Aziz, A., Jin, C. M., Jin, L.W., Garcia-Milian, R., . . . Deziel, N. C. (2018). Prioritization of reproductive toxicants in unconventional oil and gas operations using a multi-country regulatory data-driven hazard assessment. *Environment International*, 117, 348-358. doi: 10.1016/j.envint.2018.05.010

<sup>615</sup> Boulé, L. A., Chapman, T. J., Hillman, S. E., Kassotis, C. D., O'Dell, C., Robert, J., . . . Lawrence, B. P. (2018). Developmental exposure to a mixture of 23 chemicals associated with unconventional oil and gas operations alters the immune system of mice. *Toxicological Sciences*, 163(2), 639–654. doi: 0.1093/toxsci/kfy066

<sup>616</sup> Adams, B. (2018, May 1). Exposure to chemicals used in fracking impairs immune system of mice in URM study. *WXXI News*. Retrieved from <https://www.wxnews.org/post/exposure-chemicals-used-fracking-impairs-immune-system-mice-urmc-study>

<sup>617</sup> Deziel, N. C., Humeau, Z., Elliott, E. G., Warren, J. L., & Nicolai, L. M. (2018). Shale gas activity and increased rates of sexually transmitted infections in Ohio, 2000–2016, *PLoS ONE* 13(3). doi: 10.1371/journal.pone.0194203

<sup>618</sup> Marshall, A. (2018, 22 July). Study suggests potential link between fracking industry and increased sexually transmitted infections. *Columbus Dispatch*. Retrieved from <https://www.dispatch.com/news/20180722/study-suggests-potential-link-between-fracking-industry-and-increased-sexually-transmitted-infections>

- March 20, 2018 – In the Texas Barnett Shale, women with homes within a half-mile radius of the most dense gas drilling activity or gas production activity at the time of their child’s birth had, respectively, 20 percent and 15 percent higher risk of preterm birth, compared with women with no such activity near their residence. The greatest proximity-related risk was for extremely premature births (prior 28 weeks gestation): mothers living near the densest drilling activity and the densest production activity were, respectively, 100 percent and 53 percent more likely to give birth to extremely premature babies.<sup>619, 620</sup> For purposes of this study, the drilling phase included drilling of the wellbore, installation of casing, and fracking, whereas the production phase, which can last for years, included the flowback of gas, condensate, and produced water, as well as possible on-site storage of these materials. Researchers noted that they did not have access to information that would have allowed more refined classification of phases. The study included 13,332 preterm birth cases and 66,933 term births in the 24-county Barnett Shale region between 2010 and 2012. The study also addressed trimester-specific differences in risk, finding little evidence for that factor. (See also entry for September 19, 2017.)
- March 13, 2018 – A research team found higher rates of hospitalizations for pneumonia among individuals ages 65 and older in Pennsylvania counties with drilling and fracking operations compared to those without. This result is consistent with other studies reporting links between respiratory problems and air pollution. This study, which used enhanced county-specific data from 2001 to 2013, expands on earlier research in its geographical reach and longer time horizon. The research team also found higher average hospitalization rates for other air pollution-sensitive diseases (acute myocardial infarction, chronic obstructive pulmonary disease, asthma, and upper respiratory infections) in counties containing unconventional natural gas wells than in those without wells, but those links were not as strong statistically as for pneumonia among the elderly. Noting that their study design may actually underestimate the impact of natural gas development on pneumonia, the research team stated that their study “helps establish a consistent link between unconventional natural gas extraction and higher rates of disease.”<sup>621</sup>
- February 7, 2018 – Female mice exposed to a mixture of 23 fracking chemicals during early life developed dose-specific abnormalities in their mammary glands. The researchers saw changes in tissue morphology, cell proliferation, “and the induction of unique intraductal hyperplasias.”<sup>622</sup> (Intraductal hyperplasia is an overgrowth of cells that is considered a marker for future breast cancer risk.) Researchers used four doses; the lower two used were equivalent to concentrations found in drinking water in fracking

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<sup>619</sup> Whitworth, K. W., Marshall, A. K., & Symanski, E. (2018). Drilling and production activity related to unconventional gas development and severity of preterm birth. *Environmental Health Perspectives*, 126(3). doi: 10.1289/EHP2622

<sup>620</sup> Konkel, L. (2018). Drilling into critical windows of exposure: Trimester-specific associations between gas development and preterm birth, *Environmental Health Perspectives*, 126(10). doi: 10.1289/EHP3762

<sup>621</sup> Peng, L., Meyerhoefer, C., & Chou, S.-Y. (2018). The health implications of unconventional natural gas development in Pennsylvania. *Health Economics*, 27, 956–983 doi: 10.1002/hec.3649

<sup>622</sup> Sapouckey, S. A., Kassotis, C. D., Nagel, S. C., & Vandenberg, L. N. (2018). Prenatal exposure to unconventional oil and gas operation chemical mixtures altered mammary gland development in adult female mice. *Endocrinology*, 159, 1277–1289. doi: 10.1210/en.2017-00866

regions and the highest dose represented concentrations that have been measured in industry wastewater. Mammary gland effects varied for each the doses, but all groups developed intraductal hyperplasia. According to a co-author, “This study shows that a mixture of [fracking] chemicals can affect the long-term health of the mouse mammary gland, even after low level exposures in the womb.”<sup>623</sup>

- January 15, 2018 – A study of urban oil drilling in two Los Angeles neighborhoods found elevated asthma rates among residents living within 1,500 feet of oil wells. Researchers compared diagnosed asthma rates in these areas to a representative comparison area (the California Health Interview Survey’s “SPA6” in South Los Angeles) and to Los Angeles County as a whole.<sup>624</sup> The diagnosed asthma rates in the two study areas were statistically significantly higher (16.1 percent and 23.6 percent) than the comparison area (9.8 percent). Asthma prevalence in one of the two study areas was significantly higher than that in Los Angeles County as a whole. Households with smokers were excluded from the analysis. This interdisciplinary team worked in partnership with the local residents to conduct this community-based survey with limited resources and urged further studies with more complex scientific design.
- December 13, 2017 – A team of health economists analyzed fracking’s health impacts on infants. They examined birth certificates for all 1.1 million infants born in Pennsylvania between 2004 and 2013 and combined these data with maps showing when and where gas wells were drilled in the state. Their results indicated that the introduction of fracking “reduces health among infants born to mothers living within 3 km (1.9 miles) of a well site during pregnancy.” For mothers living within one kilometer (.6 miles), they found a 25 percent increase in the probability of low birth weight, “significant declines” in average birth weight, as well as declines in other measures of infant health. They also observed reductions in infant health when mothers lived within one to three kilometers of a fracking site; these were about one-third to one-half of the declines of those mothers living closer.<sup>625</sup> The researchers estimated that “about 29,000 out of the nearly 4 million U.S. births (0.7 percent) annually occur within 1 kilometer of a fracking site and 95,500 are born within 3 kilometers.” “For policymakers weighing the costs and benefits of fracking before deciding whether to allow it in their communities, this study provides a clear cost: an increase in the probability of poorer health for babies born near these sites.”<sup>626</sup>

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<sup>623</sup> University of Massachusetts at Amherst. (2018, February 7). Changes in mouse breast tissue after exposure to fracking chemicals. *ScienceDaily*. Retrieved from <https://www.sciencedaily.com/releases/2018/02/180207090108.htm>

<sup>624</sup> Shamasunder, B., Collier-Oxandale, A., Blickley, J., Sadd, J., Chan, M., Navarro, S., . . . Wong, N. J. (2018). Community-based health and exposure study around urban oil developments in South Los Angeles. *International Journal of Environmental Research and Public Health*, 15. doi: 10.3390/ijerph15010138

<sup>625</sup> Currie, J., Greenstone, M., & Meckel, K. (2017). Hydraulic fracturing and infant health: New evidence from Pennsylvania. *Science Advances*, 3(12), e1603021. doi: 10.1126/sciadv.1603021

<sup>626</sup> Currie, J., Greenstone, M., & Meckel, K. (2017). Hydraulic fracturing and infant health: New evidence from Pennsylvania (Research Summary). *Energy Policy Institute at the University of Chicago*. Retrieved from [https://epic.uchicago.edu/sites/default/files/EPIC\\_121017\\_FrackingResearchSummary\\_Final.121317.pdf](https://epic.uchicago.edu/sites/default/files/EPIC_121017_FrackingResearchSummary_Final.121317.pdf)



- November 6, 2017 – As part of a pilot project, a team of Montreal-based public health researchers evaluated exposure of pregnant mothers to VOCs in an area of intensive fracking in northeastern British Columbia. At least 28,000 unconventional natural gas wells had been drilled to date in the Peace River Valley. Analyzing the urine of 29 pregnant women, researchers found high concentrations of muconic acid, which is a degradation product of benzene, a widely studied developmental toxicant and an air contaminant in the vicinity of gas wells. The median concentration of this chemical was approximately 3.5 times higher in the study group than in the general Canadian population. In five of the 29 women, the concentration of muconic acid exceeded an exposure index by the American Conference of Governmental Industrial Hygienists that was designed for workplace settings. (No guidelines for the public exist.) By design, this small pilot study sets the groundwork for more extensive biomonitoring and environmental analysis.<sup>627</sup>
- September 19, 2017 – University of Texas Health Science Center researchers conducted a case-control study nested within their larger cohort of women with single births (see entry for July 21, 2017, below) in the 24-county Barnett Shale between November 30, 2010 and November 29, 2012. Its specific purpose was to consider timing of unconventional gas development activity “during potentially sensitive windows of exposure,” as well as “potential differences in risk by UGD drilling phase,” with regard to preterm births. Results suggest a link between maternal residential proximity to UGD-activity and preterm births, which were similar by drilling phase and “slightly stronger in the first two trimesters of pregnancy.”<sup>628</sup>
- September 14, 2017 – Researchers reviewed health assessments taken between February 2012 and October 2015 of adults in Pennsylvania communities with intense unconventional natural gas development (UNGD). The most frequently reported symptoms were sleep disturbance, headache, throat irritation, stress/anxiety, cough, shortness of breath, sinus problems, fatigue, wheezing, nausea, each occurring in over 20 percent of the sample. Over 43 percent of the sample reported sleep disturbance. To meet the inclusion criteria, as developed and implemented by a physician and nurse practitioner, the symptoms were reviewed to ensure no plausible cause relating to “past medical and surgical history, concurrent medical conditions, family and social history, and environmental exposures unrelated to UNGD. For example, if the social history indicated a ½ pack/day smoking history, the symptom of ‘difficulty breathing’ was not included.” Independently, the timing of the exposure for each symptom that met the inclusion criteria was determined, using the beginning drilling date for each unconventional natural gas well within one kilometer (.6 miles) of the patient’s residence;

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<sup>627</sup> Caron-Beaudoin, É, Valter, N., Chevrier, J., Ayotte, P., Frohlich, K., & Verner, M.-A. (2017). Gestational exposure to volatile organic compounds (VOCs) in Northeastern British Columbia, Canada: A pilot study. *Environment International*, 110, 131-138. doi: 10.1016/j.envint.2017.10.022

<sup>628</sup> Marshall, A. K., Symanski, E., & Whitworth, K. W. (2017). The association between unconventional gas development and preterm birth: Evaluating drilling phases and critical windows of susceptibility [Abstract]. *Annals of Epidemiology*, 27(8), 530.

records were excluded if it was not possible to verify at least one gas well within this distance.<sup>629</sup>

- August 21, 2017 – Using county-level data from 2003 to 2013, researchers found that, all together, counties in the Marcellus Shale region that experienced a boom in hydraulic fracturing showed a 20 percent increase in the incidence rate of gonorrhea.<sup>630</sup>
- July 21, 2017 – A University of Texas Health Science Center School of Public Health team assessed the links between the residential proximity of pregnant mothers to unconventional natural gas development activity and various newborn health problems: preterm birth, small-for-gestational age (SGA), fetal death, and low birth weight. They found evidence of a “moderate positive association” between residential proximity to UGD-activity and increased odds of preterm birth, and a “suggestive association” with fetal death. Nearly 159,000 births and fetal deaths from November 30, 2010 to November 29, 2012 in the 24-county Barnett Shale area were considered.<sup>631</sup>
- February 15, 2017 – A study from the University of Colorado School of Public Health and Anschutz Medical Campus showed that children and young adults between the ages of 5 and 24 with acute lymphocytic leukemia (ALL) were 4.3 times more likely to live in area dense with active oil and gas wells. The researchers did not find such a link with ALL cases in 0-4 year olds, or with incidence of non-Hodgkin lymphoma. The study focused on rural areas and towns in 57 Colorado counties and did not include cities of more than 50,000 people. Authors wrote, “Because oil and gas development has potential to expose a large population to known hematologic carcinogens, such as benzene, further study is clearly needed to substantiate both our positive and negative findings.”<sup>632</sup>
- October 26, 2016 – A study that investigated possible links between fracking and cancer incidence in southwest Pennsylvania found elevated rates of bladder and thyroid cancers in six counties with shale gas activity.<sup>633</sup> Bladder cancer was elevated in both males and females, with a 10 percent increase in the number of observed cases from 2000 to 2012. Over the same time period, thyroid cancer jumped even more dramatically. “There was a huge 91.2% increase in the number of observed cases from 2000 to 2012.” Patterns of leukemia incidence were less clearly related to shale gas activity. The author expressed caution in attributing these trends solely to shale gas development due to “the multiple

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<sup>629</sup> Weinberger, B., Greiner, L. H., Walleigh, L., & Brown, D. (2017). Health symptoms in residents living near shale gas activity: A retrospective record review from the Environmental Health Project. *Preventive Medicine Reports*, 8, 112-115. doi: 10.1016/j.pmedr.2017.09.002

<sup>630</sup> Komarek, T., & Cseh, A. (2017). Fracking and public health: Evidence from gonorrhea incidence in the Marcellus Shale region. *Journal of Public Health Policy*, 38(4), 464-481. doi: 10.1057/s41271-017-0089-5

<sup>631</sup> Whitworth, K. W., Marshall, A. K., & Symanski, E. (2017). Maternal residential proximity to unconventional gas development and perinatal outcomes among a diverse urban population in Texas. *PLOS ONE*, 12(7), e0180966. doi: 10.1371/journal.pone.0180966

<sup>632</sup> McKenzie, L. M., Allshouse, W. B., Byers, T. E., Bedrick, E. J., Serdar, B., & Adgate, J. L. (2017). Childhood hematologic cancer and residential proximity to oil and gas development. *PLOS ONE*, 12(2), e0170423. doi: 10.1371/journal.pone.0170423

<sup>633</sup> Finkel, M. L. (2016). Shale gas development and cancer incidence in southwest Pennsylvania. *Public Health*, 141, 198-206. doi: 10.1016/j.puhe.2016.09.008

sources of potentially toxic, harmful exposures in southwest Pennsylvania, many dating back decades,” the long latency time required for many cancers to develop, and possible synergisms between exposures from shale gas development and past toxic exposures.

- August 25, 2016 – Researchers found that Pennsylvanians residing near intensive unconventional gas well activity were significantly more likely to experience chronic rhino sinusitis (at least three months of nasal and sinus symptoms), migraine headaches, and higher levels of fatigue than residents who do not live near such activity.<sup>634</sup> Data were gathered from nearly 8,000 patients of Geisinger Health System from 40 counties in north and central Pennsylvania, and matched with the proximity of respondents to all phases of gas drilling activity and intensity, using information from the Pennsylvania Departments of Environmental Protection (PA DEP) and Conservation and Natural Resources, as well as satellite imagery. According to lead author Aaron W. Tustin, MD, MPH, resident physician in the Department of Environmental Health Sciences at the Johns Hopkins Bloomberg School of Public Health, “[t]hese three health conditions can have debilitating impacts on people’s lives... In addition, they cost the health care system a lot of money.”<sup>635</sup>
- July 18, 2016 – Living near fracking operations significantly increases asthma attacks, according to a Johns Hopkins University study of 35,000 medical records of people with asthma in north and central Pennsylvania, from 2005 to 2012.<sup>636</sup> The data show that those who live near a higher number of, or larger, active gas wells were 1.5 to 4 times more likely to suffer from asthma attacks compared to those who live farther away, with the closest group having the highest risk. There was increased risk in all three types of exacerbations defined: mild (new oral corticosteroid medication order), moderate (emergency department encounter), or severe (hospitalization). In addition, researchers identified increased risk during all four phases of well development: pad preparation, drilling, stimulation (fracking), and production. The study was praised for its “rigorous research methods,” by a scientist not part of the team.<sup>637</sup>
- July 5, 2016 – Researchers from five universities and the U.S. Geological Survey (USGS) identified a link between exposure to fracking and drilling chemicals and adverse reproductive and developmental outcomes in laboratory mice. The study used 23 oil and gas chemicals in four different concentrations, representing concentrations found in drinking water and groundwater, to higher concentrations found in oil and gas industry

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<sup>634</sup> Tustin, A. W., Hirsch, A. G., Rasmussen, S. G., Casey, J. A., Bandeen-Roche, K., & Schwartz, B. S. (2017). Associations between unconventional natural gas development and nasal and sinus, migraine headache, and fatigue symptoms in Pennsylvania. *Environmental Health Perspectives*, 125, 189-197. doi: 10.1289/EHP281

<sup>635</sup> Phillips, S. (25 August, 2016). New study links gas drilling to migraines, fatigue and chronic sinus symptoms. *State Impact Pennsylvania*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2016/08/25/new-study-points-to-association-between-gas-drilling-to-migraines-fatigue-and-chronic-sinus-symptoms/>

<sup>636</sup> Rasmussen, S. G., Ogburn, E. L., McCormack, M., Casey, J. A., Bandeen-Roche, K., Mercer, D. G., & Schwartz, B. S. (2016). Association between unconventional natural gas development in the Marcellus Shale and asthma exacerbations. *JAMA Internal Medicine*. Advance online publication. doi: 10.1001/jamainternmed.2016.2436

<sup>637</sup> Song, L., & Kusnetz, N. (2016, July 18). Increased asthma attacks tied to exposure to natural gas production. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/18072016/asthma-study-marcellus-shale-pennsylvania-natural-gas-fracking>

wastewater. Offspring of pregnant laboratory mice consuming these mixtures were compared to those that did not. Results suggested “numerous potential threats to fertility and reproductive success ... including altered pituitary hormone levels, reproductive organ weights, and disrupted ovarian follicle development.” Researchers observed these negative outcomes even in the offspring exposed to the lowest dose of chemicals. Building on previous research showing reduced sperm counts in male offspring, they also reported on “tentative mechanistic information for the observed adverse health effects.”<sup>638</sup>

- February 9, 2016 – An exploratory study of hospitalization rates for three study areas in Queensland, Australia showed rates for specific types of hospital admissions increased more quickly in a coal seam gas study area than in other study areas (a coal mining area and a rural/agricultural area). Coal seam gas is the methane trapped in pores and fractures in underground coal deposits; its exploitation is a form of unconventional natural gas development. A portion of coal seam gas extraction uses fracking. This preliminary study found the strongest link between increased hospitalization rates over time in a coal seam gas area to be for the category of ‘Blood/immune’ diseases.<sup>639</sup>
- October 14, 2015 – Using an animal model, an interdisciplinary research team measured the endocrine-disrupting activities of 24 chemicals used and/or produced by oil and gas operations, finding that 23 of them “can activate or inhibit the estrogen, androgen, glucocorticoid, progesterone, and/or thyroid receptors, and mixtures of these chemicals can behave synergistically, additively, or antagonistically.” Further, the researchers tested prenatal exposures to the chemicals and found effects on multiple organs, including adverse reproductive effects on the matured offspring.<sup>640</sup> This study is the first to demonstrate that endocrine-disrupting chemicals, which are commonly used in fracking operations, can harm the reproductive health of mice, at levels of exposure that are realistic for humans. The study’s senior author told *ScienceDaily*, “In addition to reduced sperm counts, the male mice exposed to the mixture of chemicals had elevated levels of testosterone in their blood and larger testicles. These findings may have implications for the fertility of men living in regions with dense oil and/or natural gas production.”<sup>641</sup>
- October 8, 2015 – Pregnant women who live near active fracking operations in Pennsylvania were at a 40 percent increased risk of giving birth prematurely and at a 30 percent increased risk for having obstetrician-labeled high-risk pregnancies, according to a study by Johns Hopkins Bloomberg School of Public Health and other researchers.

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<sup>638</sup> Kassotis, C. D., Bromfield, J. J., Klemp, K. C., Meng, C-X., Wolfe, A., Zoeller, R. T., . . . Nagel, S. C. (2016). Adverse reproductive and developmental health outcomes following prenatal exposure to a hydraulic fracturing chemical mixture in female C57Bl/6 Mice. *Endocrinology*, 157(9), 3469–3481. doi: 10.1210/en.2016-1242

<sup>639</sup> Werner, A. K., Watt, K., Cameron, C. M., Vink, S., Page, A., & Jagals, P. (2016). All-age hospitalization rates in coal seam gas areas in Queensland, Australia, 1995–2011. *BMC Public Health*, 16(125). doi: 10.1186/s12889-016-2787-5

<sup>640</sup> Kassotis, C.D., Klemp, K.C., Vu, D.C., Lin, C.-H., Meng, C.-X., Besch-Williford, C.L., . . . Nagel, S.C. (2015). Endocrine-disrupting activity of hydraulic fracturing chemicals and adverse health outcomes after prenatal exposure in male mice. *Endocrinology* 156(12), 4458–4473. doi: 10.1210/en.2015-1375

<sup>641</sup> Endocrine Society. (2015, October 14). Fracking chemicals tied to reduced sperm count in mice. *ScienceDaily*. Retrieved from [www.sciencedaily.com/releases/2015/10/151014134533.htm](http://www.sciencedaily.com/releases/2015/10/151014134533.htm)

High-risk pregnancies were those that included hypertension, high pre-pregnancy body mass index, and asthma. The study used data from the Geisinger Health System on 9,384 pregnant women and their 10,496 newborns between January 2009 and January 2013; Geisinger covers 40 counties in north and central Pennsylvania. Researchers developed an index for proximity to fracking wells based on distance from the women's homes, stage of drilling and depth of wells dug, and the amount of gas that was produced at those wells during the pregnancies. The highest-activity quartile had the highest rates of premature births and high-risk pregnancies.<sup>642, 643</sup>

- July 22, 2015 – Using a mammal model, New York University School of Medicine scientists, together with other U.S. and Chinese researchers, demonstrated cancerous changes linked to exposure to wastewater from Marcellus fracking operations. Their study also documented elevated levels of barium and strontium in exposed animal cells. The wastewater studied originated in Pennsylvania and was stored for a time to allow radioactivity and levels of short-lived VOCs to decline. The results suggest that “even aged flow back water could pose substantial health threats to exposed humans.”<sup>644</sup>
- July 15, 2015 – A study by University of Pennsylvania and Columbia University researchers found that drilling and fracking activity was associated with increased rates of hospitalization in Pennsylvania. During a period of dramatic increase in drilling and fracking activity between 2007 and 2011, inpatient prevalence rates surged for people living near shale gas wells. Cardiology inpatient prevalence rates were significantly associated with number of wells per zip code and their density, while neurology inpatient prevalence rates were significantly associated with density of wells. Hospitalizations for cancer, skin conditions, and urological problems also rose significantly. During the same time period, no such increase in health problems was observed in a control Pennsylvania county without any drilling and fracking activity. In communities with the most wells, the rate of cardiology hospitalizations was 27 percent higher than in control communities with no fracking. “While the clinical significance of the association remains to be shown, [fracking] has just begun in Pennsylvania, and thus observing a significant association over this short time is striking.... Our study also supports the concept that health care utilization should be factored into the value (costs and benefits) of hydraulic fracturing over time.”<sup>645</sup> In a related *Newsweek* story, lead researcher Reynold Panettieri, Jr. said, “At this point, we suspect that residents are exposed to many toxicants, noise and social stressors due to hydraulic fracturing near their homes and this may add to the increased

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<sup>642</sup> Casey, J. A., Savitz, D. A., Rasmussen, S. G., Ogburn, E. L., Pollak, J., Mercer, D. G., & Schwartz, B. S. (2016). Unconventional natural gas development and birth outcomes in Pennsylvania, USA. *Epidemiology* 27(2), 163–172. doi: 10.1097/EDE.0000000000000387

<sup>643</sup> Johns Hopkins Bloomberg School of Public Health. (2015, October 8). Study: fracking industry wells associated with premature birth. Retrieved from <http://www.jhsph.edu/news/news-releases/2015/study-fracking-industry-wells-associated-with-premature-birth.html>

<sup>644</sup> Yao, Y., Chen, T., Shen, S. S., Niu, Y., DesMarais, T. L., Linn, R., . . . Costa, M. (2015). Malignant human cell transformation of Marcellus Shale gas drilling flow back water. *Toxicology and Applied Pharmacology*, 288, 121–130. doi: 10.1016/j.taap.2015.07.011

<sup>645</sup> Jemielita T., Gerton G. L., Neidell, M., Chillrud S., Yan B., Stute, M., . . . Panettieri, Jr., R. A. (2015). Unconventional gas and oil drilling is associated with increased hospital utilization rates. *PLoS ONE* 10(7), e0131093. doi: 10.1371/journal.pone.0131093

number of hospitalizations.”<sup>646</sup>

- July 9, 2015 – As part of a scientific assessment of well stimulation treatments, including fracking, the California Council on Science and Technology studied the potential impacts of well stimulation on human health in California. The risk factors directly attributable to well stimulation stem largely from the use of a very large number and quantity of stimulation chemicals. The unknown number and toxicity of chemicals that are mixed together in well stimulation fluids made it difficult to fully quantify risk to the environment and to human health, but the study highlighted the potential health risks from exposure to fracking-related air pollution for the people of Los Angeles, 1.7 million of whom live or work within one mile of an active oil or gas well.<sup>647</sup> Jane Long, co-author, said, “officials should fully understand the toxicity and environmental profiles of all chemicals before allowing them to be used in California's oil operations,” according to the *Los Angeles Times*.<sup>648</sup>
- June 22, 2015 – A longtime midwife reported her personal analysis of an ongoing spike in infant deaths, miscarriages, and placental abnormalities in Utah’s Uintah Basin that has followed the advent of drilling and fracking activity there and appears linked to air pollution episodes.<sup>649</sup>
- June 3, 2015 – A University of Pittsburgh study linked fracking to low birthweight in three heavily drilled Pennsylvania counties. The more exposure a pregnant woman had to gas wells, the higher her risk for a smaller-than-normal baby. Exposure was determined as proximity and density of wells in relation to the residence of the pregnant woman. Compared to mothers whose homes had the fewest surrounding gas wells, mothers whose homes were nearest to a high density of wells were 34 percent more likely to have babies who were “small for gestational age,” meaning they weighed significantly less than expected for the number of weeks of pregnancy. Although the study did not investigate mechanisms, researchers identified air as the likely route of exposure. They supported this argument by referencing another study done in Western Pennsylvania where airborne particulate pollution correlated with low birth weight and by noting that particulates are established shale gas infrastructure emissions.<sup>650, 651</sup> Low birth weight is a leading cause

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<sup>646</sup>Schlanger, Z. (2015, July 15). Living near fracking wells linked to increased hospitalization rates. *Newsweek*. Retrieved from <http://www.newsweek.com/living-near-fracking-wells-linked-increased-hospitalization-rates-354093>

<sup>647</sup>Shonkoff, S. B. C., Maddalena, R. L., Hays, J., Stringfellow, W., Wettstein, Z. S., Harrison, R., Sandelin, W., & McKone, T. E. (2015, July 9). Potential impacts of well stimulation on human health in California, in California Council of Science and Technology and Lawrence Berkeley National Laboratory, *An Independent Scientific Assessment of Well stimulation in California, vol. 2: Potential Environmental Impacts of Hydraulic Fracturing and Acid Stimulation*. Retrieved from <http://ccst.us/publications/2015/2015SB4-v2.pdf>

<sup>648</sup>Cart, J. (2015, July 9). Water and wildlife may be at risk from fracking’s toxic chemicals, panel finds. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/lanow/la-me-california-science-panel-warns-that-fracking-poses-unknown-risk-20150709-story.html>

<sup>649</sup>Solotaroff, P. (2015, June 22). What’s killing the babies of Vernal, Utah? *Rolling Stone*. Retrieved from <http://www.rollingstone.com/culture/features/fracking-whats-killing-the-babies-of-vernal-utah-20150622>

<sup>650</sup>Shaina, L. S., Brink, L. L., Larkin, J. D., Sadovsky, Y., Goldstein, B. C., Pitt, B. R., & Talbott, E. O. (2015). Perinatal outcomes and unconventional natural gas operations in southwest Pennsylvania. *PLoS One*, 10, e0126425. doi: 10.1371/journal.pone.0126425

of infant mortality.

- March 3, 2015 – A follow-up study of 21 case studies from five states found that the distribution of symptoms in animals and humans affected by nearby fracking operations was, since 2012, unchanged for humans and companion animals. In food animals, reproductive problems decreased over time while respiratory problems and growth problems increased. “This longitudinal case study illustrates the importance of obtaining detailed epidemiological data on the long-term health effects of multiple chemical exposures and multiple routes of exposure that are characteristic of the environmental impacts of unconventional drilling operations.”<sup>652</sup>
- March 3, 2015 – A cross-sectional study by Yale University School of Medicine researchers using companion animals as sentinels of human exposure to fracking-related chemicals investigated possible associations between reported health conditions of companion and backyard animals in Southwest Pennsylvania and household proximity to drilling and fracking operations. Among dogs living in households located less than one kilometer from a gas well, risks for health problems were elevated, especially for dermal conditions, compared to animals living more than two kilometers from a well.<sup>653</sup>
- January 1, 2015 – A Yale-led team studied the relationship between household proximity to drilling and fracking operations and reported health symptoms in Washington County, Pennsylvania where 624 gas wells were in active operation, most of which had been drilled in the past five to six years. Researchers found that health symptoms reported by residents increased in frequency as distance between household and gas wells decreased. Among persons living less than one kilometer from drilling and fracking operations, rashes and upper respiratory problems were more prevalent. The authors of this study, the largest to date on the link between reported symptoms and natural gas drilling activities, say that their findings are “... consistent with earlier reports of respiratory and dermal conditions in persons living near natural gas wells.” They also cite literature demonstrating the biological plausibility of a link between oil and gas extraction activities and both categories of health effects reported.<sup>654</sup>
- December 17, 2014 – As part of a lengthy review that became the foundation for New York State’s ban on high volume hydraulic fracturing, the New York State Department of

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<sup>651</sup> Preidt, R. (2015, June 3). ‘Fracking’ linked to low birth weight babies, *WebMD*. Retrieved from <http://www.webmd.com/parenting/baby/news/20150603/fracking-linked-to-low-birth-weight-babies>

<sup>652</sup> Bamberger, M., & Oswald, R. E. (2015). Long-term impacts of unconventional drilling operations on humans and animal health. *Journal of Environmental Science and Health, Part A: Toxic/Hazardous Substances and Environmental Engineering*, 50, 447-59. doi: 10.1080/10934529.2015.992655

<sup>653</sup> Slizovskiy, I. B., Conti, L. A., Trufan, S. J., Reif, J. S., Lamers, V. T., Stowe, M. H., Dziura, J., & Rabinowitz, P. M. (2015). Reported health conditions in animals residing near natural gas wells in southwestern Pennsylvania, *Journal of Environmental Science and Health, Part A: Toxic/Hazardous Substances and Environmental Engineering*, 50(5), 473-481, doi: 10.1080/10934529.2015.992666

<sup>654</sup> Rabinowitz, P. M. Slizovskiy, I. B., Lamers, V., Trufan, S. J., Holford, T. R., Dziura, J. D., ... Stowe, M. H. (2015). Proximity to natural gas wells and reported health status: results of a household survey in Washington County, Pennsylvania. *Environmental Health Perspectives*, 123, 21-26. doi: 10.1289/ehp.1307732. See also footnote 29.

Health (NYS DOH) identified environmental problems associated with fracking that could contribute to adverse public health impacts. Among them: air pollution (particulate matter, ozone, diesel exhaust, and VOCs) that could affect respiratory health; drinking water contamination from underground migration of methane and/or fracking chemicals associated with faulty well construction or seismic activity; drinking water contamination from inadequate water treatment of fracking waste or from surface spills of fracking chemicals or wastewater; earthquakes and the creation of fissures; increased vehicle traffic; increased noise; increased demand for housing and medical care; and public health problems related to climate change impacts from methane and other greenhouse gas emissions into the atmosphere. The NYS DOH Public Health Review also discussed findings from surveys of health symptoms among residents living near high volume hydraulic fracturing activities. These included skin rash, nausea or vomiting, abdominal pain, breathing difficulties, cough, nosebleed, anxiety, stress, headache, dizziness, eye irritation, and throat irritation in populations living near drilling and fracking operations. The NYS DOH Public Health Review noted that ongoing studies by both government agencies and several academic institutions were exploring the public health risks and impacts of fracking but that many of these studies were years from completion. The review concludes:

... significant gaps exist in the knowledge of potential public health impacts from [high volume hydraulic fracturing].... The existing science investigating associations between [high volume hydraulic fracturing] activities and observable adverse health outcomes is very sparse and the studies that have been published have significant scientific limitations. Nevertheless, studies are suggestive of potential public health risks related to [high volume hydraulic fracturing] activity that warrant further careful evaluation.

In an accompanying letter to the New York State Department of Environmental Conservation, Health Commissioner Howard Zucker, MD, concluded,

... the overall weight of the evidence from the cumulative body of information contained in this Public Health Review demonstrates that there are significant uncertainties about the kinds of adverse health outcomes that may be associated with [high volume hydraulic fracturing], the likelihood of the occurrence of adverse health outcomes and the effectiveness of some of the mitigation measures in reducing or preventing environmental impacts which could adversely affect public health. Until the science provides sufficient information to determine the level of risk to public health from [fracking] to all New Yorkers and whether the risks can be adequately managed, DOH recommends that high volume hydraulic fracturing should not proceed in NYS.<sup>655</sup>

- October 13, 2014 – According to the North Dakota Health Department, the number of HIV and AIDS cases in North Dakota more than doubled between 2012 and 2014, and

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<sup>655</sup> New York State Department of Health. (2014, December 17). *A public health review of high volume hydraulic fracturing for shale gas development*. Retrieved from [http://www.health.ny.gov/press/reports/docs/high\\_volume\\_hydraulic\\_fracturing.pdf](http://www.health.ny.gov/press/reports/docs/high_volume_hydraulic_fracturing.pdf)



cases were shifting to the state's western oil fields, where 35-40 percent of all new cases occurred. Previously, only 10 percent of cases were in that region.<sup>656</sup> This trend followed on the heels of an upsurge in sexually transmitted chlamydia cases in the same region. The North Dakota state director of disease control, Kirby Kruger, attributed the uptick in HIV cases to the drilling and fracking industry and attempted to spread HIV prevention messages at the "man camps" that house young male workers in the oil industry.<sup>657</sup> Human trafficking for purposes of prostitution accompanied the fracking boom, but there was a shortage of medical professionals to address this public health crisis, according to Kruger, who noted that it was difficult to hire nurses and medical staff who could live in the area on a public health wage.

- October 2, 2014 – According to researchers from the University of Pennsylvania's Center of Excellence in Environmental Toxicology, an increasing number of gas wells in Pennsylvania is significantly correlated with inpatient rates of hospitalization. The research team collected data from seven different insurance providers for three counties; the study's publication is forthcoming.<sup>658</sup>
- September 11, 2014 – In Texas, commercial vehicle accidents have increased more than 50 percent since 2009 when the state's ongoing drilling and fracking boom began, according to an investigation by the *Houston Chronicle* and Houston Public Media News 88.7. "For six decades, highway deaths have dropped steadily all across the United States.... But in Texas all motor vehicle fatalities – and accidents involving commercial trucks – have turned back upward since the state's oil drilling and fracking boom began in 2008." This rising motor vehicle death toll is especially felt in formerly rural counties in the Eagle Ford and Permian Basin, now places of heavy drilling and fracking. A new Department of Public Safety "Road Check" program finds annually, "27 to 30 percent of Texas' commercial trucks shouldn't be operating at all due to potentially life-threatening safety problems like defective brakes, bald tires, inoperable safety lights and unqualified, unfit or intoxicated drivers."<sup>659, 660</sup>
- August 3, 2014 – Hospitals in the Bakken Shale region reported a sharp rise in ambulance calls and emergency room visits after 2006. "Mercy Medical Center in Williston and the Tioga Medical Center in neighboring Williams County saw their ambulance runs increase by more than 200 percent. Tioga's hospital saw a staggering leap in trauma patients by 1,125 percent. Mercy had a 373 percent increase." Drugs (including overdoses of

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<sup>656</sup> Associated Press. (2014, October 13). North Dakota HIV/AIDs rate rises with population growth. *Billings Gazette*. Retrieved from [http://billingsgazette.com/news/state-and-regional/montana/north-dakota-hiv-aids-rate-rises-with-population-growth/article\\_a939fed6-f737-5cfb-957f-ab800673f4d7.html](http://billingsgazette.com/news/state-and-regional/montana/north-dakota-hiv-aids-rate-rises-with-population-growth/article_a939fed6-f737-5cfb-957f-ab800673f4d7.html)

<sup>657</sup> Heitz, D. (2014, September 30). Oil boom helps fuel surge in HIV in North Dakota. *HealthlineNews*. Retrieved from <http://www.healthline.com/health-news/oil-boom-helps-fuel-hiv-surge-north-dakota-093014#1>

<sup>658</sup> Skrapits, E. (2014, October 2). Study: More gas wells in area leads to more hospitalizations. *The Citizen's Voice*. Retrieved from <http://citizensvoice.com/news/study-more-gas-wells-in-area-leads-to-more-hospitalizations-1.1763826>

<sup>659</sup> Olsen, L. (2014, 11 September). Fatal truck accidents have spiked during Texas' ongoing fracking and drilling boom. *Houston Chronicle*. Retrieved from <http://www.houstonchronicle.com/news/article/Fracking-and-hydraulic-drilling-have-brought-a-5747432.php?cmpid=email-premium&cmpid=email-premium&t=1a9ca10d49c3f0c8a9#0>

<sup>660</sup> Schneider, A. (2014, 12 October). In Texas, traffic deaths climb amid fracking boom. *National Public Radio*. Retrieved from <http://www.npr.org/2014/10/02/352980756/in-texas-traffic-deaths-climb-amid-fracking-boom>

prescription drugs, methamphetamine, and heroin) explain many of the cases, with oilfield related injuries such as “fingers crushed or cut off, extremity injuries, burns and pressure burns” accounting for 50 percent of the cases in one of the region’s hospital emergency rooms.<sup>661</sup>

- May 21, 2014 – Raising questions about possible links to worsening air pollution from the Uintah Basin’s 11,200 oil and gas wells, health professionals reported that infant deaths in Vernal, Utah, rose to six times the normal rate over the past three years. Physician Brian Moench said, “We know that pregnant women who breathe more air pollution have much higher rates of virtually every adverse pregnancy outcome that exists... And we know that this particular town is the center of an oil and gas boom that’s been going on for the past five or six years and has uniquely high particulate matter and high ozone.”<sup>662</sup> Although it formerly had pristine air quality, Uintah County, Utah received a grade “F” for ozone in the American Lung Association’s 2013 State of the Air Report.<sup>663</sup>
- January 28, 2014 – Congenital heart defects, and possibly neural tube defects in newborns, were associated with the density and proximity of natural gas wells within a 10-mile radius of mothers’ residences in a study of almost 25,000 births from 1996 to 2009 in rural Colorado. The researchers note that natural gas development emits several chemicals known to increase risk of birth defects (teratogens).<sup>664</sup>
- January 4, 2014 – Preliminary data from researchers at Princeton University, Columbia University, and MIT showed elevated rates of low birthweight among infants born to mothers living near drilling and fracking operations during their pregnancies.<sup>665</sup>
- October 2013 – A preliminary study of the health impacts of oil and gas extraction on infant health in Colorado found that proximity to wells—linked with air pollutants from fracking operations—was associated with reductions in average birthweight and length of pregnancy as well as increased risk for low birthweight and premature birth.<sup>666</sup> A study by the same author, currently under review, which analyzed births to Pennsylvania mothers residing close to a shale gas well in Pennsylvania from 2003 to 2010, also identified increased risk of adverse effects. This includes low birth weight, as well as a 26 percent increase in APGAR scores under 8. (APGAR—or American Pediatric Gross

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<sup>661</sup> Bryan, K. J. (2014, August 3). Drugs, oilfield work, traffic pushing more people through doors of Watford City ER. *Bakken Today*. Retrieved from <http://www.bakkentoday.com/event/article/id/37101/>

<sup>662</sup> Schlanger, Z. (2014, May 21). In Utah boom town, a spike in infant deaths raises questions. *Newsweek*. Retrieved from <http://www.newsweek.com/2014/05/30/utah-boom-town-spike-infant-deaths-raises-questions-251605.html>

<sup>663</sup> American Lung Association. (2013). American Lung Association state of the air 2013. Retrieved from <http://www.stateoftheair.org/2013/states/utah/uintah-49047.html>

<sup>664</sup> McKenzie, L. M., Guo, R., Witter, R. Z., Savitz, D. A., Newman, L. S., & Adgate, J. L. (2014). Birth outcomes and maternal residential proximity to natural gas development in rural Colorado. *Environmental Health Perspectives*, 122, 412-417. doi: 10.1289/ehp.1306722

<sup>665</sup> Whitehouse, M. (2014, January 4). Study shows fracking is bad for babies. *Bloomberg*. Retrieved from <http://www.bloombergvew.com/articles/2014-01-04/study-shows-fracking-is-bad-for-babies>

<sup>666</sup> Hill, E. L. (2013, October). The impact of oil and gas extraction on infant health in Colorado. Retrieved from <http://www.elainehill.com/research>

Assessment Record—is a measure of newborn responsiveness. Scores of less than 8 predict an increase in the need for respiratory support.)<sup>667</sup> (See entry above for August 13, 2018.)

- August 26, 2013 – Medical experts at a rural clinic in heavily-drilled Washington County, Pennsylvania reported case studies of 20 individuals with acute symptoms consistent with exposure to air contaminants known to be emitted from local fracking operations.<sup>668, 669</sup>
- May 2, 2013 – A community-based participatory research study in Pennsylvania tested air and water quality and surveyed self-reported health symptoms of more than 100 residents living near drilling and fracking operations. The team detected a total of 19 VOCs in ambient air sampled outside of homes. The reported health symptoms closely matched the established effects of chemicals detected through air and water testing at those nearby sites. Moreover, those symptoms occurred at significantly higher rates in households closer to the gas facilities than those farther away.<sup>670</sup> Indicative of the growing prevalence of such health impacts in the state, a poll showed that two-thirds of Pennsylvanians support a moratorium on fracking because of concern about negative health impacts.<sup>671</sup>

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<sup>667</sup> Hill, E. L. (2013, December). Shale gas development and infant health: Evidence from Pennsylvania (under review). Retrieved from <http://www.elainehill.com/research>.

<sup>668</sup> Abrams, L. (2013, August 26). Fracking's real health risk may be from air pollution. *Salon*. Retrieved from [http://www.salon.com/2013/08/26/frackings\\_real\\_health\\_risk\\_may\\_be\\_from\\_air\\_pollution/](http://www.salon.com/2013/08/26/frackings_real_health_risk_may_be_from_air_pollution/)

<sup>669</sup> Dyrzka, L., Nolan, K., & Steingraber, S. (2013, August 27). *Statement on preliminary findings from the Southwest Pennsylvania Environmental Health Project study* [Press release]. Concerned Health Professionals of NY. Retrieved from <http://concernedhealthny.org/statement-on-preliminary-findings-from-the-southwest-pennsylvania-envir...>

<sup>670</sup> Steinzor, N., Subra, W., & Sumi, L. (2013). Investigating links between shale gas development and health impacts through a community survey project in Pennsylvania. *New Solutions: A Journal of Environmental and Occupational Health Policy*, 23(1), 55-83. doi: 10.2190/NS.23.1.e

<sup>671</sup> Phillips, S. (2013, May 14). Poll shows support for a drilling moratorium in Pennsylvania. *StateImpact*. Retrieved from <http://stateimpact.npr.org/pennsylvania/2013/05/14/poll-shows-support-for-a-drilling-moratorium-in-pennsylvania/>

## Noise pollution, light pollution, and stress

*Drilling and fracking operations and ancillary infrastructure expose workers and nearby residents to continuous noise and light pollution that is sustained for periods lasting many months. Chronic exposure to light at night is linked to adverse health effects, including breast cancer. Sources of fracking-related noise pollution include blasting, drilling, flaring, generators, compressor stations, and truck traffic. Exposure to environmental noise pollution is linked to cardiovascular disease, cognitive impairment, and sleep disturbance. In Colorado, noise measured during construction and drilling of a large, multi-well pad in a residential area exceeded levels known to increase the risk of cardiovascular diseases and hypertension. In rural Canada, residents living near drilling and fracking operations experienced community upheaval and showed multiple signs of trauma. Oil and gas production noise may be disrupting wildlife health in protected areas. Workers and residents whose homes, schools, and workplaces are in close proximity to well sites are at risk from these exposures as well as from related stressors. Existing “setback distances” may not be adequate to reduce public health threats, especially for vulnerable populations. A UK Health Impact Assessment (HIA) identified stress and anxiety resulting from drilling-related noise—as well as from a sense of uncertainty about the future and eroded public trust—as key public health risks related to fracking operations.*

- October 8, 2018 – Researchers collected noise measurements from residential areas, inside and outside homes, near two different gas well pads and a compressor station, north and south of Pittsburgh, Pennsylvania. Measurements from all of the outside areas had at least some decibel levels exceeding the recommended limits of the U.S. Environmental Protection Agency (EPA), and one indoor measurement near the compressor station exceeded the recommended level for noise measured inside homes. An accompanying survey documented that 96 percent of respondents were “worried about their overall health as a result of the noise.” Fifty-seven percent were bothered “a great deal” by the noise, and slightly more than half of respondents said that their sleep was disturbed “a great deal” by the noise.<sup>672</sup>
- October 4, 2018 – In the month following one or more earthquakes greater than magnitude 4 experienced in an Oklahoma county, motor vehicle crashes increased 4.6 percent. Anxiety-inducing life events increase the risk of motor vehicle crashes, and earthquakes are known to increase anxiety. University of California, Berkeley public health researchers used data on Oklahoma earthquakes between 2010 and 2016, known to have drastically increased in the state due to fracking wastewater injection, and county-level monthly vehicle crash counts. Authors noted “the high economic and social costs of such vehicle crashes,” which were \$2.9 billion in Oklahoma in 2010.<sup>673</sup>

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<sup>672</sup> Richburg, C. M., & Slagley, J. (2018). Noise concerns of residents living in close proximity to hydraulic fracturing sites in Southwest Pennsylvania. *Public Health Nursing*, 36, 3-10. doi: 10.1111/phn.12540

<sup>673</sup> Casey, J. A., Elser, H., Goldman-Mellor, S., & Catalano, R. (2018). Increased motor vehicle crashes following induced earthquakes in Oklahoma, USA. *Science of the Total Environment*, 650, 2974-2979. doi: 10.1016/j.scitotenv.2018.10.043

- May 30, 2018 – Anxiety-related Google searches increased 5.8 percent during months when there was more than one magnitude 4 or higher earthquake experienced in Oklahoma, from January 2010 to May 2017. Google searches for anxiety peaked three weeks after magnitude 4 or higher quakes, University of California, Berkeley public health researchers found. Oil and gas wastewater injection has dramatically increased seismicity in Oklahoma; in the study period, there were 8,908 earthquakes across the state of Oklahoma, an average of 218 earthquakes per month. Authors noted, “excessive anxiety... may disable individuals and has long-term implications for health and functioning,” and that “excessive symptoms of anxiety occur more readily in response to a recurrent and unpredictable stressor, such as the Oklahoma earthquakes included in our study.”<sup>674</sup>
- May 11, 2018 – Over 40 percent of daytime and 23.6 percent of nighttime audible noise measurements taken during construction and drilling of a large, multi-well pad in a residential area were found to exceed the level that research has demonstrated to increase the risk of health effects, such as cardiovascular diseases and hypertension. When the researchers used an additional measurement that captures low frequency noise levels, these results showed that 97.5 percent of daytime and 98.3 percent of nighttime measurements exceeded the level “recommended to minimize impacts such as nausea and headaches.” The measurements collected during this study were from four locations, over three months, in residential areas with oil and gas development in Colorado. Researchers concluded that the distances from the well pad at which some of their measurements were taken, highlight “that homes in closer proximity to operations will likely experience noise exposure at levels of concern even with the implementation of sound mitigation best management practices.”<sup>675</sup>
- December 29, 2017 – Every participant reported experiencing effects in one or more of five categories—psychological stress, social stress, environment, physical health, and traffic—in a study of how residents of two adjacent counties in Ohio are impacted by unconventional natural gas development. Most respondents reported impacts in three or more of the five categories. Types of psychological stress reported included general stress and uncertainty about the future; feeling frustrated and manipulated after interactions with the oil and gas industry; experiencing stress from noise or light pollution; and regional displacement. Researchers found that experiences of social stress extended to include divisions among family or community; fears of, or direct experiences of, environmental health harms; observing dying, unhealthy trees; and traffic-related effects. Nearly all residents interviewed had experienced dangerous encounters with oil and gas truck drivers and observed that damaged roads had become increasingly common.<sup>676</sup>

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<sup>674</sup> Casy, J. A., Goldman-Mellor, S., & Catalano, R. (2018). Association between Oklahoma earthquakes and anxiety-related Google search episodes. *Environmental Epidemiology*, 2, e016. doi: 10.1097/EE9.0000000000000016

<sup>675</sup> Blair, B. D., Brindley, S., Dinkeloo, E., McKenzie, L. M., & Adgate, J. L. (2018). Residential noise from nearby oil and gas well construction and drilling. *Journal of Exposure Science & Environmental Epidemiology*, 28, 538–547. doi: 10.1038/s41370-018-0039-8

<sup>676</sup> Fisher, M. P., Mayer, A., Vollet, K., Hill, E L., & Haynes, E. N. (2018). Psychosocial implications of unconventional natural gas development: Quality of life in Ohio's Guernsey and Noble Counties. *Journal of Environmental Psychology*, 55, 90-98. Advance online publication. doi: 10.1016/j.jenvp.2017.12.008

- July 28, 2017 – A Canadian case study of the social impacts of fracking in a conservative, upper middle class, rural region of southern Alberta found that residents experienced “complete upheaval in their beliefs, and for many, their experiences with contamination, and fears of future exposure, dominate their lives.”<sup>677</sup> Participants described acute impacts to their own health, to family members’ health, to their livestock (including fertility problems), and to their land (included disrupted crop production and abrupt changes to the landscape). The study further reported that authorities failed to respond, “in a manner expected by the victims” to these problems. In addition, “corrosion of community” occurred at a time when victims needed community support the most. The author posited, following a consideration of the literature on toxic contamination and trauma, that her interviewees had experienced the three key indications of trauma: loss of agency, hyperarousal, and ontological insecurity linked to the negative effects on normal daily routines, a sense of order and continuity, and human dignity. The author noted that the contamination experienced by the interviewees reflected a “new normal of non-conventional fossil fuel industries.”
- May 5, 2017 – Oil and gas production was one of the main anthropogenic noise sources (though the proportion for which it was responsible was not determined) in a study that quantified the degree and extent of noise pollution in U.S. protected areas (PAs) and critical habitat for endangered species. Authors “compared noise pollution among land management and protection status and investigated sources responsible for generating noise across PAs.” The team of biologists and engineers found that human-caused noise doubled background sound in 63 percent of U.S. protected areas, and produced a tenfold or greater increase in 21 percent of protected areas. These levels are “known to interfere with human visitor experience and disrupt wildlife behavior, fitness, and community composition.” Researchers also found a 10-fold increase in sound levels in 14 percent of critical habitats of endangered species.<sup>678</sup>
- April 3, 2017 – A University of Maryland team conducted a pilot study of noise pollution at eight homes located less than a half mile (750 meters) from natural gas compressor stations in West Virginia and compared decibel levels to those collected from homes located further away. They found that daytime and nighttime noise levels were higher at properties located closer to a compressor, as measured both inside and outside the homes. Five of six homes that were monitored for a full 24-hour period had combined day-night indoor average noise levels that exceed 60 decibels (dBA), which exceeds both EPA’s recommended limits for chronic noise exposure as well those recommended by the World Health Organization. To date, no federal noise standards exist for oil and gas operations. Noting that noise exposure has been associated in previous studies with sleep disruption, poor academic performance, and hypertension, the authors conclude, “Findings indicate that living near natural gas compressor stations could potentially result

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<sup>677</sup> Davidson, D. J. (2018) Evaluating the effects of living with contamination from the lens of trauma: A case study of fracking development in Alberta, Canada, *Environmental Sociology*, 4(2), 196-209. Advance online publication. doi: 10.1080/23251042.2017.1349638

<sup>678</sup> Buxton, R. T., McKenna, M. F., Mennitt, D., Fristrup, K., Crooks, K., Angeloni, L., & Wittemyer, G. (2017). Noise pollution is pervasive in U.S. protected areas. *Science*, 356 (6337), 531-533. doi: 10.1126/science.aah4783

in high environmental noise exposures. Larger studies are needed to confirm these findings and evaluate potential health impacts and protections measures.”<sup>679</sup>

- December 9, 2016 – A review analyzing the relevant scientific literature on the potential public health impacts of ambient noise related to unconventional oil and gas development found that “oil and gas activities produce noise at levels that may increase the risk of adverse health outcomes, including annoyance, sleep disturbance, and cardiovascular disease.” The team of environmental and occupational health scientists collected available measurements of noise levels at oil and gas operations and analyzed the data with established noise standards. Authors stated that many noise sources from fracking operations are similar to those of conventional oil and gas development, but that high-volume hydraulic fracturing activities present additional noise risks. These arise from conditions including four to five times the length of time needed to drill the well, and the much greater volume of water and higher pressures needed, compared to a traditional vertical well. They described the complexity of noise associated with oil and gas operations, including both intermittent and continuous noise, varying in intensities. The review included focus on vulnerable populations, including children, the elderly, and the chronically ill. Authors noted that existing “setback distances” – already often the result of political compromise and not evidence-based – may be insufficient to reduce public health threats, and that maximum allowable noise levels should be lower for schools and hospitals.<sup>680</sup>
- July 9, 2015 – As part of its assessment of potential health impacts, the California Council of Science and Technology looked at the impacts of noise and light pollution from oil and gas operations in California. The researchers noted that a number of activities associated with drilling and fracking generated noise at levels considered dangerous to public health. Noise is a biological stressor that can aggravate or contribute to the development of hypertension and heart problems. In California, noise from well stimulation was associated with both sleep disturbance and cardiovascular disease in a dose-response relationship. Exposure to artificial light at night has been linked to breast cancer in women, although almost no research has been conducted on the public health implications of light pollution from oil and gas extraction specifically.<sup>681</sup>
- December 17, 2014 – The New York State Department of Health (NYS DOH) identified community impacts related to noise as a potential contributor to a variety of negative health impacts from drilling and fracking operations but noted that considerable scientific uncertainty remains on the issue of noise exposure per se as a risk factor. Noise, air

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<sup>679</sup> Boyle, M. D., Soneja, S., Quirós-Alcalá, L., Dalemarre, L., Sapkota, A. R., Sangaramoorthy, T. ... Sapkota, A. (2017). A pilot study to assess residential noise exposure near natural gas compressor stations. *PLoS ONE*, 12(4), e0174310. doi: 10.1371/journal.pone.0174310

<sup>680</sup> Hays, J., McCawley, M., & Shonkoff, S. B. C. (2016). Public health implications of environmental noise associated with unconventional oil and gas development. *Science of the Total Environment*, 580, 448-556. doi: 10.1016/j.scitotenv.2016.11.118

<sup>681</sup> Shonkoff, S. B. C., Jordan, P., Hays, J., Stringfellow, W. T., Wettstein, Z. S., Harrison, R., . . . McKone, T. E. (2015, July 9). Volume II, Chapter 6: Potential impacts of well stimulation on human health in California. In: *An Independent Scientific Assessment of Well Stimulation in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from <http://ccst.us/publications/2015/vol-II-chapter-6.pdf>

pollution, traffic, vibration, odors, and nighttime lighting may all increase together as proximity to a drilling site decreases.<sup>682</sup>

- December 1, 2014 – Range Resources Corporation warned supervisors in Pennsylvania’s Donegal Township that a “big burn” natural gas flare will continue for as long as a week and “will produce a continuous noise of as much as 95 decibels at the well pad. Sustained decibel levels between 90 and 95 can result in permanent hearing loss, but workers will be equipped with ear protection.” Township supervisor Doug Teagarden expressed concern for residents, saying, “They told us the flare would be double the size of other well flares, and the noise will be like a siren on a firetruck.... There are houses within a couple of hundred yards of the well pad, and those folks are going to hear it.”<sup>683</sup>
- November 6, 2014 – Sakthi Karunanithi, Director of Public Health in Lancashire, UK, reported on a Health Impact Assessment (HIA) of the two proposed shale gas exploration sites in Lancashire. Karunanithi’s study determined that key risks to the health and well-being of the residents who live near the two proposed sites in Lancashire include stress and anxiety from uncertainty that could lead to “poor mental wellbeing,” and noise-related health effects due to continuous drilling. The HIA also noted a lack of public trust and confidence.<sup>684, 685</sup>
- September 2014 – The Ohio Shale Country Listening Project, a collaborative effort to solicit, summarize, and share the perspectives and observations of those directly experiencing the shale gas build out in eastern Ohio, found that the more shale gas wells a community has, the less popular the oil and gas industry becomes. Many residents reported that they had not experienced the economic benefits promised by the oil and gas industry. They complained of increased rents and costs of gas and groceries, an influx of out-of-state workers, more vehicular accidents, road destruction from large trucks, and damaged landscape and cropland. Locals reported feeling less secure and more financially strapped.<sup>686</sup>

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<sup>682</sup> New York State Department of Health. (2014, December 17). *A public health review of high volume hydraulic fracturing for shale gas development*. Retrieved from

[http://www.health.ny.gov/press/reports/docs/high\\_volume\\_hydraulic\\_fracturing.pdf](http://www.health.ny.gov/press/reports/docs/high_volume_hydraulic_fracturing.pdf)

<sup>683</sup> Hopey, D. (2014, December 1). Gas flare to light up part of Washington County. *Pittsburgh Post Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/companies-powersource/2014/12/01/Gas-flare-to-light-up-part-of-Washington-County/stories/201411250224>

<sup>684</sup> Karunanithi, S. (2014, November 6). Potential health impacts of the proposed shale gas exploration sites in Lancashire. *Reported at a meeting of the Lancashire County Council Cabinet, Thursday, 6th November, 2014 at 2.00 pm in Cabinet Room 'B' - County Hall, Preston, Item 9 on the agenda(1-68)*. Retrieved from <http://council.lancashire.gov.uk/documents/b11435/Potential%20Health%20Impacts%20of%20the%20Proposed%20Shale%20Gas%20Exploration%20Sites%20in%20Lancashire%2006th-Nov-2014.pdf?T=9>

<sup>685</sup> Dunkley, E. (2014, November 7). Fracking in Lancashire 'may affect mental health', report finds. *BBC NEWS Lancashire*. Retrieved from <http://www.bbc.com/news/uk-england-lancashire-29944212>

<sup>686</sup> Ohio Organizing Collaborative (OOC)’s Communities United for Responsible Energy (CURE), with support from the Ohio Environmental Council (OEC), FracTracker.org, and Laborers Local 809 of Steubenville. (2014, September). Ohio Shale Country Listening Project. Retrieved from [http://carrollconcernedcitizens.org/uploads/2014\\_Shale\\_Report\\_small\\_.pdf](http://carrollconcernedcitizens.org/uploads/2014_Shale_Report_small_.pdf)



- June 20, 2014 – In its discussion of “Oil and Gas Drilling/Development Impacts,” the U.S. Office of Indian Energy and Economic Development detailed noise pollution from bulldozers, drill rigs, diesel engines, vehicular traffic, blasting, and flaring of gas. “If noise-producing activities occur near a residential area, noise levels from blasting, drilling, and other activities could exceed the U.S. Environmental Protection Agency (EPA) guidelines. The movement of heavy vehicles and drilling could result in frequent-to-continuous noise.... Drilling noise would occur continuously for 24 hours per day for one to two months or more depending on the depth of the formation.”<sup>687</sup> Exposure to chronic noise can be deadly. The World Health Organization has documented the connection between environmental noise and health effects, including cardiovascular disease, cognitive impairment, sleep disturbance, and tinnitus. At least one million “healthy life years” are lost every year from traffic-related noise in the western part of Europe.<sup>688</sup>
- February 24, 2014 – In a review of the health effects from unconventional gas extraction published in the journal *Environmental Science & Technology*, leading researchers noted, “Noise exposure is a significant hazard due to the presence of multiple sources, including heavy equipment, compressors, and diesel powered generators. Loud continuous noise has health effects in working populations. It is likely that exposure to noise is substantial for many workers, and this is potentially important for health because drilling and servicing operations are exempt from some sections of the Occupational Safety and Health Administration noise standard.” They noted that research should investigate stressors such as noise and light in the context of drilling and fracking operations in order to understand the overall effect of chemical and physical stressors together.<sup>689</sup>
- May 30, 2014 – The *Denver Post* reported that in order to help meet Colorado’s noise limits for fracking operations in suburban neighborhoods (and partially block the glare of floodlights), Encana Oil and Gas erected 4-inch-thick polyvinyl walls up to 32 feet high and 800 feet long. Residents said that the plastic walls do not completely solve the problem.<sup>690</sup>
- October 25, 2013 – An analysis of well location and census data by the *Wall Street Journal* revealed that at least 15.3 million Americans now live within a mile of a well that has been drilled since 2000. According to this investigation, the fracking boom has ushered in “unprecedented industrialization” of communities across wide swaths of the

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<sup>687</sup> Oil and Gas Drilling/Development Impacts. (n.d.). *Oil and gas drilling/development impacts*. Retrieved from <http://teeic.indianaffairs.gov/er/oilgas/impact/drilldev/index.htm>

<sup>688</sup> Rodier, G. (2011, June 1). Burden of disease from environmental noise - Quantification of healthy life years lost in Europe. *WHO*. Retrieved from [http://www.who.int/quantifying\\_ehimpacts/publications/e94888/en/](http://www.who.int/quantifying_ehimpacts/publications/e94888/en/)

<sup>689</sup> Adgate, J. L., Goldstein, B. D., & McKenzie, L. M. (2014). Potential public health hazards, exposures and health effects from unconventional natural gas development. *Environmental Science & Technology* 48(15), 8307-20. doi: 10.1021/es404621d

<sup>690</sup> Finley, B. (2014, May 29). Oil and gas industry building giant walls to try to ease impact. *The Denver Post*. Retrieved from [http://www.denverpost.com/ci\\_25859469/oil-and-gas-industry-building-giant-walls-try](http://www.denverpost.com/ci_25859469/oil-and-gas-industry-building-giant-walls-try)

nation and, with it, “24/7” industrial noise, stadium lighting, earth-moving equipment, and truck traffic.<sup>691</sup>

- April 16, 2013 – In a presentation on oil field light pollution for a conference on “Sustainable Environment and Energy: Searching for Synergies,” Roland Dechesne of the Royal Astronomical Society of Canada described problems of “light trespass,” glare, and poorly-aimed fixtures in oil fields in Alberta. He described resulting “mass waterfowl mortality” linked to artificial illumination and other biochemical impacts of light pollution on wildlife, as well as the possibility of these effects on humans, including circadian disruption, melatonin suppression, and possible resulting hormonally-linked diseases.<sup>692</sup> Known to have ecological impacts, outdoor light pollution from drilling and fracking operations may also be linked to artificial light-associated health effects documented in humans, including breast cancer.<sup>693</sup>
- April 2013 – Led by the University of Pittsburgh Graduate School of Public Health, a study of community members living in proximity to Marcellus Shale drilling in Pennsylvania found adverse impacts to mental health, with stress the most frequently reported symptom. At least half of all respondents in each set of interviews reported these specific stressors, including: being taken advantage of; health concerns; concerns/complaints ignored; corruption; denied information or provided with false information. Many also reported the desire to move or leave community, estrangement from community, and financial damages. Researchers noted that stress can result in direct health impacts.<sup>694</sup> Notably, mounting evidence indicates that chronic stress magnifies individuals’ susceptibility to effects of pollution; for children, this interactive effect can begin during prenatal life.<sup>695</sup>
- September 7, 2011 – A study by researchers at Boise State University and Colorado State University at Fort Collins modeled the potential impacts of compressor station noise from oil and gas operations on Mesa Verde National Park in Colorado. The study found the sound of 64 compressors outside Mesa Verde elevated the sound level within the park by 34.8 decibels on average, and by 56.8 decibels on the side of the park located closest to

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<sup>691</sup> Gold, R., & McGinty, T. (2014, Oct. 25). Energy boom puts wells in America’s backyards. *The Wall Street Journal*. Retrieved from <http://online.wsj.com/news/articles/SB10001424052702303672404579149432365326304>

<sup>692</sup> Dechesne, R. (2013). Limiting oil field light pollution for safety and the environment. Sustainable Environment and Energy CPANS 2013 Conference. Retrieved from

<http://www.cpans.org/assets/Uploads/Presentations/NewFolder/Session-46Roland-Dechesne.pdf>

<sup>693</sup> Chepesiuk, R. (2009). Missing the dark: Health effects of light pollution. *Environmental Health Perspectives*, 117(1), A20–A27.

<sup>694</sup> Ferrar, K. J., Kriesky, J., Christen, C. L., Marshall, L. P., Malone, S. L., Sharma, R. K., . . . Goldstein, B.D. (2013). Assessment and longitudinal analysis of health impacts and stressors perceived to result from unconventional shale gas development in the Marcellus Shale region. *International Journal of Occupational & Environmental Health*, 19(2), 104–112. doi: 10.1179/2049396713Y.0000000024

<sup>695</sup> Cooney, C.M. (2011). Stress–pollution interactions: An emerging issue in children’s health research. *Environmental Health Perspectives*, 119, a430–a435. <http://dx.doi.org/10.1289/ehp.119-a430>

the compressors. According to the EPA, 55 decibels is the highest “safe noise level” to avoid damage to the human ear.<sup>696</sup>

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<sup>696</sup> Barber, J. R., Burdett, C.L., Reed, S. E., Warner, K.A., Formichella, C., Crooks, K.R., . . . Fristrup, K. M. (2011). Anthropogenic noise exposure in protected natural areas: Estimating the scale of ecological consequences. *Landscape Ecology*, 26(9), 1281-1295. doi: 10.1007/s10980-011-9646-7

## Earthquakes and seismic activity

*Definitive evidence from Ohio, Arkansas, Texas, Oklahoma, Kansas, and Colorado links fracking wastewater disposal wells to earthquakes of magnitudes as high as 5.8, in addition to swarms of minor earthquakes. Both the U.S. Geological Survey (USGS) and state geological agencies such as the Oklahoma Geological Survey now acknowledge that earthquakes can be caused by wastewater injection into disposal wells. Many recent studies focus on the mechanical ability of pressurized fluids to trigger seismic activity by unclamping stressed faults. In some cases, and especially in Canada, Oklahoma, Ohio, and China, the fracking process itself has been linked to earthquakes. Emerging evidence suggests that risk of earthquakes can continue to rise for years after waste injection and cannot be prevented through “proper” fracking protocols or by solely limiting the rate or volume of injected fluid. Injecting fracking waste into shallower zones is one method for reducing earthquake risk, but shallow injection raises the risk for groundwater contamination. The question of what to do with fracking wastewater remains a problem with no viable, safe solution.*

- March 27, 2019 – The USGS deployed additional seismometers in the area around south Alabama and the Florida Panhandle following the detection of five earthquakes in the course of a week. The earthquakes, ranging in magnitude from 2.1 to 3.7, occurred in an area flagged as likely experiencing more seismic activity over the past decade due to oil and gas operations in the area.<sup>697</sup> In 1997, a series of earthquakes, including the second largest in Alabama’s history (at magnitude 4.9), occurred in the same region and was tentatively linked to oil and gas drilling and two associated injection wells nearby.<sup>698</sup>
- March 8, 2019 – Over a two-day period in February 2019, three earthquakes struck a farming community in an area of China’s Sichuan Province that is experiencing a fracking boom. Two people were killed, 13 injured, 20,000 homes destroyed, and 1,600 people displaced. In response to citizen protests, fracking operations were suspended.<sup>699</sup>
- March 1, 2019 – A USGS-led team monitored leakage and fluid pressure over time in a permeable bedrock formation used for disposal of fracking waste in Osage County, Oklahoma. By inserting specially designed instruments into an unused disposal well within this formation, the team demonstrated an overall trend of increasing fluid pressure. “The only conceivable source of this increase is due to the injection of wastewater.” The results also showed evidence that fracking waste is leaking out of the reservoir where it is being injected “at a significant rate.” The direction of the leakage appears mostly downward into the basement rock below. The authors note that disposal of fracking waste

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<sup>697</sup> Pillion, D. (2019, March 27). Did fracking cause south Alabama earthquakes? Federal researchers investigating. *Al.com*. Retrieved from <https://www.al.com/news/mobile/2019/03/did-fracking-cause-south-alabama-earthquakes-federal-researchers-investigating.html>

<sup>698</sup> Gomberg, J., & Wolf, L. (1999). Possible cause for an improbable earthquake: The 1997  $M_w$  4.9 southern Alabama earthquake and hydrocarbon recovery. *Geology*, 27(4), 367-370. doi: 10.1130/0091-7613(1999)027<0367:PCFAIE>2.3CO;2

<sup>699</sup> Myers, S. L. (2019, March 8). China experiences a fracking boom, and all the problems that go with it. *New York Times*. Retrieved from <https://www.nytimes.com/2019/03/08/world/asia/china-shale-gas-fracking.html?smid=nytcore-ios-share>

is the leading cause of pressure changes on faults in Oklahoma and that fluid pressure changes are, in turn, the leading cause of earthquakes in Oklahoma.<sup>700</sup>

- December 12, 2018 – For six continuous years, hydraulic fracturing and related activities have triggered multiple earthquakes of varying magnitudes in northwestern Alberta and northeastern British Columbia, with the operations of one company linked to tremors that have jolted Fort St. John from 2012 to 2018.<sup>701</sup> Between September 2013 and January 2015 alone, researchers in western Alberta, Canada detected than 900 seismic events, ranging in magnitude from 1 to 4. Real-time recordings of seismic activity were generally consistent with published empirical and point-source simulation models. Approximately 80 percent of the events in the compiled database occurred “in distinct clusters in time and space that are characteristic of induced events.”<sup>702</sup> These induced earthquakes pose hazards to roads, pipelines, dams, groundwater, and public safety. Canadian scientists question whether any regulatory system could effectively forecast, control, or prevent them. In some cases, cessation of injection activities following large, potentially damaging earthquakes appears to a sufficient response. However, in other cases, quakes occur months after injection activities, falling outside the windows of immediate intervention that most “traffic light systems” are put in place to address.<sup>703</sup> Further, companies are allowed to continue their activities despite predictions that considerable seismic activity may result, including earthquakes of much greater magnitude than predicted.<sup>704</sup>
- November 28, 2018 – Noting that fracking is a microseismic event, a research team investigated whether the activity of hydraulic fracturing itself, and not just the disposal of fracking waste, can trigger earthquakes and might be contributing to the dramatic increases in frequency of seismic events across the central and eastern United States. The team focused on Oklahoma where they identified roughly 700 fracking-induced earthquakes, including 12 with magnitude between 3 and 3.5. Previous reports had described only two fracking-induced earthquakes in Oklahoma. Results also confirmed that, in Oklahoma, proximity of an injection site to a critically stressed fault is a better predictor of induced seismicity than a more commonly accepted general approach based on proximity to the Precambrian basement layer. These results demonstrate that public research provides far greater detail and accuracy than data and notifications voluntarily released by drilling operators.<sup>705</sup>

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<sup>700</sup> Barbour, A. J., Xue, L., Roeloffs, E., & Rubinstein, J. L. (2019). Leakage and increasing fluid pressure detected in Oklahoma’s wastewater disposal reservoir. *JGR Solid Earth*, 124(3), 2896-2919. doi: 10.1029/2019JB017327

<sup>701</sup> Nikiforuk, A. (2018, December 12). Company linked to tremors that jolted Fort St. John triggered previous quakes. *The Tyee*. Retrieved from <https://thetyee.ca/News/2018/12/12/Fort-St-John-Tremors/>

<sup>702</sup> Novakovic, M., & Atkinson, G. M. (2015). Preliminary evaluation of ground motions from earthquakes in Alberta. *Seismological Research Letters*, 86(4). doi: 10.1785/0220150059

<sup>703</sup> Nikiforuk, A. (2018, December 4). Fracking linked to quake that jolted Fort St. John. *The Tyee*. Retrieved from <https://thetyee.ca/News/2018/12/04/Fracking-Linked-Quake-Jolted-Fort-St-John/>

<sup>704</sup> Little, S. (2018, December 22). Fort St. John earthquakes were caused by fracking: BC Oil and Gas Commission. *Global News*. Retrieved from <https://globalnews.ca/news/4789210/fort-st-john-fracking-earthquakes/>

<sup>705</sup> Skoumal, R. J., Ries, R., Brudzinski, M. R., Barbour, A. J., & Currie, B. S. (2018). Earthquakes induced by hydraulic fracturing are pervasive in Oklahoma. *Journal of Geophysical Research: Solid Earth*, 123, 10,918-10,935. doi: 10.1029/2018JB016790

- November 11, 2018 – In Lancashire, England, fracking has triggered at least 37 minor earthquakes. Regulations require suspension of fracking activities when seismicity exceeds magnitude 0.5. Energy company Cuadrilla, which had previously supported these limits, lobbied the government to relax the regulations in order to allow fracking to continue. These calls have been rejected by the energy minister.<sup>706</sup>
- October 31, 2018 – A holistic analysis of fracking waste disposal practices and seismicity compared intensely drilled regions across the United States, including the Bakken, Eagle Ford, and Permian shale basins, as well as basins in Oklahoma. Results showed consistent links between increased seismicity and increased depth of wastewater injection, increased rate of injection, and increased regional injection volumes. Shallower disposal wells help lower the risk of earthquakes. However, they raise the risk of groundwater contamination as increased pressures can push fluids through “faults or fractures or through abandoned oil wells that have not been properly plugged.” The researchers also noted that deep waste disposal carries the risk of introducing toxic fluids into karstified areas where there is “limited geologic characterization of the disposal zone.” These deep, cave-like zones may transmit fluids in an unknown, unpredictable fashion.<sup>707</sup>
- August 31, 2018 – To delineate possible mechanisms for the induction of earthquakes at unexpectedly large distances from injection wells, researchers looked at data in the public domain from around the world. They found two patterns. One type of seismicity, manifesting a “direct pressure effect,” clusters near wells and tends to be shallow, of modest magnitude, and to decay abruptly. The second type of seismicity, potentially triggered by elastic stresses, tends to occur in deeper layers, decay slowly, and exhibit larger spatial footprints and magnitudes. Both shallow and deep formations present unique risks, and these should be included in mitigation strategies.<sup>708</sup> With low to moderate-sized human-made earthquakes putting 1 in 50 people in the United States at risk according to a recent USGS analysis, injection practices for oil and gas wastewater are “creating a ripple effect far beyond ... drilling locations.”<sup>709</sup>
- April 27, 2018 – The use of fracking to enhance geothermal energy recovery activated two faults in a previously unknown fault system and triggered a magnitude 5.5 earthquake near Pohang, South Korea. Using primarily publicly available data, the researchers characterized the fault dimensions, faulting mechanism, and depth of

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<sup>706</sup> Vaughan, A. (2018, November 11). Fracking firm boss says it didn't expect to cause such serious quakes. *The Guardian*. Retrieved from <https://www.theguardian.com/environment/2018/nov/11/fracking-firm-boss-says-it-didnt-expect-to-cause-such-serious-quakes-lancashire?fbclid=IwAR2BEOJ3ySPm-7WiigVilQQyyjdZqAxOHbZxYGEH4s9RFbObbUfPwKGW9dM>

<sup>707</sup> Scanlon, B. R., Weingarten, M. B., Murray, K. E., & Reedy, R. C. (2018). Managing basin-scale fluid budgets to reduce injection-induced seismicity from the recent U.S. shale oil revolution. *Seismological Research Letters*, 90(1), 171-182. doi: 10.1785/0220180223

<sup>708</sup> Goebel, T. H. W., & Brodsky, E. E. (2018). The spatial footprint of injection wells in a global compilation of induced earthquake sequences. *Science*, 361(6405), 899–904. doi: 10.1126/science.aat5449

<sup>709</sup> Guarino, B. (2018, August 30). How energy companies set off earthquakes miles away from their waste dumps. *Washington Post*. Retrieved from [https://www.washingtonpost.com/science/2018/08/30/how-energies-companies-set-off-earthquakes-miles-away-their-waste-dumps/?utm\\_term=.ee67ec5d693a](https://www.washingtonpost.com/science/2018/08/30/how-energies-companies-set-off-earthquakes-miles-away-their-waste-dumps/?utm_term=.ee67ec5d693a)

earthquake activity, which correlated with surface deformation at the time of the earthquake activity. The earthquake's main shock caused extensive structural damage to buildings in and around Pohang and injured 70 people.<sup>710</sup>

- March 16, 2018 – Utilizing satellite radar imagery, researchers observed and analyzed ground deformation, earthquake activity, and subsidence (depressions and sinkholes) that appear to be the result of “decades of oil activity and its effects on rocks below the earth's surface.”<sup>711, 712</sup> Noting that West Texas has been “punctured like a pincushion with oil wells and injection wells since the 1940s,” the team documented an “alarming rate” of heaving and sinking across a 4,000-square-mile area.<sup>713</sup> The researchers documented visible surface-level and subsurface changes from fracking, fracking waste injection, carbon dioxide injection that is used to aid in oil and gas extraction, and abandoned and uncapped wells. Some data may help sort out why hazards manifest in one site rather than another. Satellite assessments of deformation can provide crucial safety information to protect roadways, homes, businesses, industrial facilities, pipelines, and people from “potential larger catastrophic events.”
- February 27, 2018 – Since December 2016 in Oklahoma, 74 earthquakes of at least 2.5 magnitude have been linked directly to fracking. As a result, state regulators tightened mitigation protocols and required operators to use seismic arrays to detect underground movement and pause their work when earthquakes exceed magnitude 2.5.<sup>714</sup> These changes make Oklahoma's new regulations tougher than Canada's, where “the industry holds the record for causing magnitude 4-plus earthquakes by high volume fracking.”<sup>715</sup> Described by industry sources as “a cautious move forward, limiting though not hamstringing [the] oil industry,” the new regulations will be evaluated in the field for their effectiveness in reducing the frequency of earthquakes large enough to be felt at the surface.<sup>716</sup>

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<sup>710</sup> Grigoli, F., Cesca, S., Rinaldi, A. P., Manconi, A., López-Comino, J. A., Clinton, J. F., . . . S. Wiemer, S. (2018). The November 2017 Mw 5.5 Pohang earthquake: A possible case of induced seismicity in South Korea. *Science*, 360(6392), 1003-1006. doi: 10.1126/science.aat2010

<sup>711</sup> Kim, J.-W., & Lu, Z. (2018). Association between localized geohazards in West Texas and human activities, recognized by Sentinel-1A/B satellite radar imagery. *Scientific Reports*, 8, 4727. doi: 10.1038/s41598-018-23143-6

<sup>712</sup> Greene, S. (2018, March 22). Large portions of West Texas sinking at alarming rate, new report finds. *Texas Tribune*. Retrieved from <https://www.texastribune.org/2018/03/22/report-says-large-portions-west-texas-counties-are-sinking-alarming-ra/>

<sup>713</sup> Allen, M. (2018, March 20). Radar images show large swath of West Texas oil patch is heaving and sinking at alarming rates. *SMU Research News*. Retrieved from <https://blog.smu.edu/research/2018/03/20/radar-images-show-large-swath-of-texas-oil-patch-is-heaving-and-sinking-at-alarming-rates/>

<sup>714</sup> Oklahoma Corporation Commission, & Oklahoma Geological Survey. (2018, February 27). Moving forward: New protocol to further address seismicity in state's largest oil and gas play. Retrieved from <https://earthquakes.ok.gov/wp-content/uploads/2018/03/02-27-18-PROTOCOL.pdf>

<sup>715</sup> Nikiforuk, A. (2018, March 9). Spooked by quakes, Oklahoma toughens fracking rules. *The Tyee*. Retrieved from <https://thetyee.ca/News/2018/03/09/Oklahoma-Toughens-Fracking-Rules/>

<sup>716</sup> Oil Industry News. (2018, March 2). Oklahoma toughens oil fracking rules as shale earthquakes climb. *oilandgaspeople.com*. Retrieved from <https://www.oilandgaspeople.com/news/16214/oklahoma-toughens-oil-fracing-rules-as-shale-earthquakes-climb/>

- February 20, 2018 – Researchers in Kansas used high-precision data from an extensive seismometer network to detail features of a surge of earthquakes that they concluded were induced by wastewater injection in southern Kansas. Some areas were free from earthquakes, despite injection activities, suggesting that unknown local geological conditions play a role in determining seismic activity. Lack of seismic activity in these areas is “either due to a lack of fluid pathways to the basement [deep geological layer] or due to the absence of faults that are close to failing.” Regional influences led to more prolonged seismicity and were observed from wastewater injection wells located 10 or more kilometers away.<sup>717</sup>
- February 15, 2018 – In Kansas, swarms of earthquakes near oil wastewater disposal wells began in 2013. By 2017, the prodigious volumes of injected fluid created sufficient pressure to trigger earthquakes more than 50 miles away and form a “triggering front” that advanced at an average rate of nearly 10 miles per year along a permeable fault zone.<sup>718</sup> A mapping project based on gravity loads, magnetic fields, and seismic activity dating to 1979 revealed a previously unidentified subsurface fault running from central Nebraska 200 miles southeast to Kansas.<sup>719</sup>
- February 5, 2018 – Focusing their investigation on areas in Ohio that are isolated from fracking waste injection activities, researchers found that fracking itself induced earthquakes in two distinct manners. In some cases, earthquake activity occurred in shallow subsurface layers and was of short duration and small magnitude. In other, more troubling cases, earthquakes were more powerful and took place in very deep layers, far below the layers being fracked, even when fracking did not directly contact faults in the basement rock. At three of five sites, earthquake activity continued for over a month after fracking activities ceased. These results support a causal role for poroelastic stress, sometimes operating over long distances, in addition to more predictable pore fluid pressure changes, in the generation of earthquakes by fracking.<sup>720, 721</sup>
- January 19, 2018 – Some of the largest earthquakes related to fracking have occurred near Fox Creek, Alberta, in Canada. Using publicly available data, researchers studied earthquakes induced both by fracking waste injection and by hydraulic fracturing itself. In both cases, the volume of fluid injected, rather than injection rate or injection pressure,

<sup>717</sup> Rubinstein, J. L., Ellsworth, W. L., & Dougherty, S. L. (2018). The 2013–2016 Induced Earthquakes in Harper and Sumner Counties, Southern Kansas. *Bulletin of the Seismological Society of America*, 108(2), 674-689. doi: 10.1785/0120170209

<sup>718</sup> Peterie, S. L., Miller, R. D., Intfen, J. W., & Gonzales, J. B. (2018). Earthquakes in Kansas induced by extremely far-field pressure diffusion. *Geophysical Research Letters*, 45, 1395-1401. doi: 10.1002/2017GL076334

<sup>719</sup> Dunker, C. (2018, April 21). Spate of Nebraska earthquakes might be linked to Kansas tremors, UNL student researcher says. *Lincoln Journal Star*. Retrieved from [https://journalstar.com/news/local/education/spate-of-nebraska-earthquakes-might-be-linked-to-kansas-tremors/article\\_b81d0bdc-5b0e-5c98-a155-5f6499356b4d.html?\\_\\_twitter\\_impression=true](https://journalstar.com/news/local/education/spate-of-nebraska-earthquakes-might-be-linked-to-kansas-tremors/article_b81d0bdc-5b0e-5c98-a155-5f6499356b4d.html?__twitter_impression=true)

<sup>720</sup> Kozłowska, M., Brudzinski, M. R., Friberg, P., Skoumal, R. J., Baxter, N. D., & Currie, B. S. (2018). Maturity of nearby faults influences seismic hazard from hydraulic fracturing. *PNAS*, 115(8), E1720-E1729. doi: 10.1073/pnas.1715284115

<sup>721</sup> Kowalski, K. M. (2018, February 7). Fracking in shale plays could trigger earthquakes in deeper faults: Study. *Energy News Network*. Retrieved from <https://energynews.us/2018/02/07/midwest/fracking-in-shale-plays-could-trigger-earthquakes-in-deeper-faults-study/>



was most strongly correlated with seismic activity. Geologic factors also played a role, with earthquakes more likely if fracking and disposal activities were conducted closer to faulting and areas of stress. Combining injected volume with geologic factors, researchers developed a model that can predict 96 percent of the seismic variability in the region, improving hazard estimations. Calculating a “seismogenic activation potential,” particularly if coupled with microseismic monitoring in real time to detect previously unknown faulting, may improve earthquake forecasting.<sup>722</sup>

- November 24, 2017 – A team of geologists confirmed conclusively that recent earthquakes in Texas’ Fort Worth Basin were induced by underground injection of fracking waste that caused deep, critically stressed faults to slip.<sup>723</sup> The authors of this study employed a classical structural geology analysis that relied on high-resolution seismic reflection imaging, described in an interview with geophysical researcher Maria Magnani as “a little bit like an ultrasound.”<sup>724</sup> Maps of the seismically active faults in the Fort Worth Basin show no evidence of previous motion over the past millions of years and instead have been “sleeping” for approximately the past 300 million years until “awakened” at the start of the 2008 earthquake swarm associated temporally with extensive wastewater injection activities.<sup>725</sup>
- October 21, 2017 – Extending the findings of two previous studies, an investigation of earthquakes in the Raton Basin along the border of New Mexico and Colorado identified wastewater injection wells as the cause of the quakes and identified a mechanism.<sup>726</sup> All together, the location of the earthquakes, modeled pore pressures, and the direct correlation between cumulative volume of injected waste in nearby wells and the number of quakes show that seismicity in the Raton Basin is likely induced, and that elevated pore pressures deep underground are “well above earthquake-triggering thresholds.”<sup>727</sup>
- September 14, 2017 – An investigation by *Politico* found that the U.S. crude oil storage hub in Cushing, Oklahoma—the world’s largest store of oil—was not designed with

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<sup>722</sup> Schultz, R., Atkinson, G., Eaton, D. W., Gu, Y. J., & Kao, H. (2018). Hydraulic fracturing volume is associated with induced earthquake productivity in the Duvernay play. *Science*, 359, 304-308. doi: 10.1126/science.aao0159

<sup>723</sup> Magnani, M. B., Blanpied, M. L., DeShon, H. R., & Hornbach, M. J. (2017). Discriminating between natural versus induced seismicity from long-term deformation history of intraplate faults. *Science Advances*, 3(11), e1701593. doi: 10.1126/sciadv.1701593

<sup>724</sup> Guarino, B. (2017, November 24). Oil and gas industry is causing Texas earthquakes, a ‘landmark’ study suggests. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/science/wp/2017/11/24/fracking-and-other-human-activities-are-causing-texas-earthquakes-study-suggests/?tid=ss\\_tw&utm\\_term=.02bfff4181f1](https://www.washingtonpost.com/news/science/wp/2017/11/24/fracking-and-other-human-activities-are-causing-texas-earthquakes-study-suggests/?tid=ss_tw&utm_term=.02bfff4181f1)

<sup>725</sup> Kuchment, A. (2017, November 24). Drilling reawakens sleeping faults in Texas, leads to earthquakes. *Scientific American*. Retrieved from [https://www.scientificamerican.com/article/drilling-reawakens-sleeping-faults-in-texas-leads-to-earthquakes/?utm\\_source=newsletter&utm\\_medium=email&utm\\_campaign=weekly-review&utm\\_content=link&utm\\_term=2017-11-29\\_featured-this-week](https://www.scientificamerican.com/article/drilling-reawakens-sleeping-faults-in-texas-leads-to-earthquakes/?utm_source=newsletter&utm_medium=email&utm_campaign=weekly-review&utm_content=link&utm_term=2017-11-29_featured-this-week)

<sup>726</sup> Nakai, J. S., Weingarten, M., Sheehan, A. F., Bilek, S. L., & Ge, S. (2017). A possible causative mechanism of Raton Basin, New Mexico and Colorado earthquakes using recent seismicity patterns and pore pressure modeling. *Journal of Geophysical Research: Solid Earth*, 122. doi: 10.1002/2017JB014415

<sup>727</sup> Scott, J. (2017, October 24). Raton Basin earthquakes linked to oil and gas fluid injections. *University of Colorado Boulder*. Retrieved from <https://www.colorado.edu/today/2017/10/24/raton-basin-earthquakes-linked-oil-and-gas-fluid-injections>

seismic considerations in mind, nor are there seismic regulations in place for its 250,000-barrel oil tanks, which are under the purview of the Department of Transportation's Pipeline and Hazardous Materials Safety Administration. Central Oklahoma, where Cushing is located, became seismically active about five years ago when "wastewater injection and other fracking-related activities changed the seismic face of Oklahoma in dramatic fashion."<sup>728</sup> (See also entry below for November 8, 2016.)

- August 11, 2017 – Using multiple lines of evidence, researchers in China determined that a series of high-magnitude earthquakes between 2014 and 2017 in Sichuan Basin was triggered by fracking activities that re-activated pre-existing faults. "The present study shows that short-term injections (continuing over several months) for shale gas hydraulic fracturing are ... very likely to induce  $M_w$  4–5 class earthquakes in sites with similar geological and tectonic conditions within the southern Sichuan Basin."<sup>729</sup>
- May 3, 2017 – Studying two patterns of fracking waste injection in Oklahoma, geologists observed a large, unexpected impact on seismic activity at sites where injection rates drastically changed in recent years, as compared with those whose injection volumes held steady. They demonstrated that, in addition to direct pore pressure effects, deformations due to fluid flows ("poroelastic effects") play an important role in generating earthquake activity. Elevated risks for earthquakes can persist years after fracking waste is injected underground. Their findings also showed that the "magnitude of the initial change in injection rate is particularly important, but the opposite effect occurs in the transition to zero injection" (i.e., shut-in or closing a well). This result implies that "in certain faulting regimes it is theoretically possible to mitigate damaging effects of rapid shut-in by carefully tapering injection rates."<sup>730</sup> Geophysicist Andrew Barbour, lead author of the study, said that fluctuating injection rates likely have a "profound effect" on earthquake risk.<sup>731</sup> These findings suggest that the 2016 Pawnee earthquake, the strongest earthquake ever recorded in Oklahoma, may have been triggered by pulses of underground oil and gas activity years earlier.<sup>732</sup>
- April 27, 2017 – Recognizing that increased seismicity from both hydraulic fracturing and underground disposal of fracking wastewater poses a hazard to critical infrastructure, such as large dams, a Canadian geologist proposed strategies to keep the likelihood of

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<sup>728</sup> Ogrocki, S. (2017, September 24). How man-made earthquakes could cripple the U.S. economy. *Politico*. Retrieved from <http://www.politico.com/magazine/story/2017/09/14/earthquakes-oil-us-economy-fracking-215602>

<sup>729</sup> Lei, X., Huang, D., Su, J., Jiang, G., Wang, X., Wang, H., . . . Fu, H. (2017). Fault reactivation and earthquakes with magnitudes of up to  $M_w$  4.7 induced by shale-gas hydraulic fracturing in Sichuan Basin, China. *Scientific Reports*, 7, 7971. doi: 10.1038/s41598-017-08557-y

<sup>730</sup> Barbour, A. J., Norbeck, J. H., & Rubinstein, J. L. (2017). The effects of varying injection rates in Osage County, Oklahoma, on the 2016  $M_w$  5.8 Pawnee earthquake. *Seismological Research Letters*, 88(4), 1040-1053. doi: 10.1785/0220170003

<sup>731</sup> Jones, C. (2017, May 7). USGS study 'strongly suggests' short-term variations in disposal volumes served as trigger for Pawnee earthquake. *Tulsa World*. Retrieved from [http://www.tulsaworld.com/earthquakes/usgs-study-strongly-suggests-short-term-variations-in-disposal-volumes/article\\_97de08d5-9327-505d-8b51-adbc716d6c69.html](http://www.tulsaworld.com/earthquakes/usgs-study-strongly-suggests-short-term-variations-in-disposal-volumes/article_97de08d5-9327-505d-8b51-adbc716d6c69.html)

<sup>732</sup> Wertz, J. (2017, May 4). Study links pulse of oil-field wastewater to Oklahoma's strongest earthquake. *StateImpact Oklahoma*. Retrieved from <https://stateimpact.npr.org/oklahoma/2017/05/04/study-links-pulse-of-oil-field-wastewater-to-oklahomas-strongest-earthquake/>

high-failure consequences under one per ten thousand per year.<sup>733</sup> The primary strategy is the creation of “no frack” exclusion zones with a 5-kilometer (3.1 mile) radius that would surround vulnerable, critical facilities. In a larger ring beyond the exclusion zone, to approximately 25 kilometers (15.5 miles), monitoring and response protocols would be used.<sup>734</sup>

- March 1, 2017 – Despite decreases of up to 40 percent in the volume of fracking wastewater injected underground in Oklahoma, researchers from the USGS Earthquake Hazard Program forecasted that seismic hazards would remain significantly elevated there throughout 2017, with the odds of damage from induced earthquakes within the next year “similar to that of natural earthquakes in high-hazard areas of California.” About three million people in Oklahoma and southern Kansas now live with continuing increased potential for damaging shaking from induced seismicity.”<sup>735</sup> According to Mark Petersen, chief of the USGS National Seismic Hazard Mapping Project, the hazard risk remains “hundreds of times higher than before man-made activity began.”<sup>736</sup>
- February 17, 2017 – Pennsylvania’s Department of Environment Protection (PA DEP) announced that a series of small earthquakes in Lawrence County had been induced by fracturing of wells in the Utica Shale.<sup>737</sup> PA DEP officials held a webinar to discuss the situation and formulate “procedures to reduce seismic risk going forward,” but no formal report or regulatory changes have yet been made public.<sup>738</sup>
- December 20, 2016 – In an attempt to reduced the risk of earthquakes caused directly by fracking, the Oklahoma Corporation Commission’s Oil and Gas Conservation Division introduced monitoring and response guidelines that include provisions requiring oil producers to “implement mitigation plans following an earthquake of magnitude 2.5 or more and to suspend operations following a quake of magnitude 3.5 or greater.”<sup>739</sup>
- November 17, 2016 – A study of fault activation found a connection between fracking and earthquake activity in a region of Alberta, Canada that had previously been

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<sup>733</sup> Atkinson, G. M. (2017). Strategies to prevent damage to critical infrastructure due to induced seismicity. *FACETS*, 2, 374–394. doi: 10.1139/facets-2017-0013

<sup>734</sup> Nikiforuk, A. (2017, July 24). Earthquake expert proposes ‘no frack zone’ around critical infrastructure. *The Tyee*. Retrieved from <https://thetyee.ca/News/2017/07/24/Critical-Infrastructure-No-Frack-Zone/>

<sup>735</sup> Petersen, M. D., Mueller, C. S., Moschetti, M. P., Hoover, S. M., Shumway, A. M., McNamara, D. E., . . . Rukstales, K.S., (2017). 2017 one-year seismic-hazard forecast for the central and eastern United States from induced and natural earthquakes. *Seismological Research Letters*, 88(3). doi: 10.1785/0220170005

<sup>736</sup> Wilmoth, A. (2017, March 1). Oklahoma considered at ‘significant potential’ for damaging earthquakes. *News OK*. Retrieved from <http://newsok.com/article/5539785https://mail.google.com/mail/u/0/>

<sup>737</sup> Legere, L. (2017, February 17). DEP links Lawrence County earthquakes to fracking. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/policy-powersource/2017/02/16/DEP-Pennsylvania-Lawrence-County-earthquakes-appear-linked-to-fracking-Hilcorp-Energy/stories/201702160176>

<sup>738</sup> Pennsylvania Department of Environmental Protection. (2017, February 17). *Advisory – Department of Environmental Protection to hold webinar on 2016 Lawrence County seismic events*. Retrieved from <http://www.ahs.dep.pa.gov/NewsRoomPublic/articleviewer.aspx?id=21145&typeid=1>

<sup>739</sup> Hampton, L. (2016, December 20). Oklahoma's new fracking guidelines aim to reduce quake risk. *Reuters*. Retrieved from <https://www.reuters.com/article/us-oklahoma-quake-rules/oklahomas-new-fracking-guidelines-aim-to-reduce-quake-risk-idUSKBN1492R6>

seismically quiescent. The researchers demonstrated that new earthquake activity in the Fox Creek area was tightly spatially correlated with hydraulic fracturing activities. Their findings further suggested that seismic activity resulted from “stress changes due to the elastic response of the rockmass to hydraulic fracturing,” as well as “pore-pressure changes due to fluid diffusion along a permeable fault zone.”<sup>740</sup> In contrast to the central United States, where induced seismic activity is primarily caused by massive underground disposal of fracking waste, these findings pointed to the fracking process itself as the trigger. In an interview with the *New York Times*, co-author David Eaton compared fracking to a series of “small underground explosions” that travel into the rock formation and “rapidly change the stress patterns within.” These stress changes can be sufficient to trigger a slip at a critically stressed, previously undetected fault.<sup>741</sup>

- November 17, 2016 – An investigation by the *Dallas Morning News* chronicled a pattern of corruption and regulatory failings at the Texas Railroad Commission, the state agency charged with overseeing the oil and gas industry, in its disregard of evidence linking fracking waste disposal to earthquakes in North Texas.<sup>742</sup>
- November 8, 2016 – On November 6, 2016, a magnitude 5.0 earthquake struck Cushing, Oklahoma near the oil hub where 60 million barrels of crude oil were stored. The quake injured one, damaged more than 40 buildings, closed a school, and triggered evacuations. Oil infrastructure was not damaged.<sup>743</sup> (See also entry above for September 14, 2017.)
- October 7, 2016 – The EPA recommended a moratorium on the underground injection of fracking wastewater in certain earthquake-prone parts of Oklahoma after a 5.8 earthquake struck near Pawnee on September 3, 2016.<sup>744</sup> The strongest in Oklahoma’s history, the Pawnee earthquake was felt by residents in five states and prompted a state of emergency declaration as well as an order from state regulators to shut down 67 wastewater disposal wells in the area.<sup>745, 746</sup>
- September 22, 2016 – A study using satellite-based radar imagery found that the earth’s surface rose, by 3 millimeters per year, in areas of fracking waste injection. Underground

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<sup>740</sup> Bao, X., & Eaton, D. W. (2016). Fault activation by hydraulic fracturing in western Canada. *Science*, aag2583. doi: 10.1126/science.aag2583

<sup>741</sup> Fountain, H. (2016, November 17). In Canada, a direct link between fracking and earthquakes. *The New York Times*. Retrieved from <https://www.nytimes.com/2016/11/18/science/fracking-earthquakes-alberta-canada.html?mtref=www.google.com&gwh=535A4330D3C30EF6934E1739AC62D5DA&gwt=pay>

<sup>742</sup> Thompson, S., & Kuchment, A. (2016, November 17). Seismic denial: Why Texas won’t admit fracking wastewater is causing earthquakes. *Dallas Morning News*. Retrieved from [http://interactives.dallasnews.com/2016/seismic-denial/#\\_ga=2.247990020.202656599.1515906987-1750807308.1515724730](http://interactives.dallasnews.com/2016/seismic-denial/#_ga=2.247990020.202656599.1515906987-1750807308.1515724730)

<sup>743</sup> Philips, M. (2016, November 8). Why Oklahoma can’t turn off its earthquakes. *Bloomberg Businessweek*. Retrieved from <http://www.bloomberg.com/news/articles/2016-11-08/why-oklahoma-can-t-turn-off-its-earthquakes>

<sup>744</sup> Soraghan, M. (2016, October 7). EPA suggests partial disposal moratorium in Okla. *E&E EnergyWire*. Retrieved from <http://www.eenews.net/energywire/stories/1060043991>

<sup>745</sup> U.S. Geological Survey. (2016, September 3). M5.8 – 14 km NW of Pawnee, Oklahoma. Retrieved from <http://earthquake.usgs.gov/earthquakes/eventpage/us10006jxs#executive>

<sup>746</sup> Oklahoma Corporation Commission. (2016, September 12). *Latest action regarding Pawnee area* [Press release]. Retrieved from <https://www.occeweb.com/News/2016/09-12-16Pawnee%20Advisory.pdf>

pore pressures for this area exceeded those known to trigger earthquakes. These findings provide proof that the migration of fracking wastewater into faults increased pressures in ways that triggered a 4.8 magnitude earthquake in east Texas in 2012. The researchers emphasized that pore pressure elevation and propagation from fracking wastewater injection may evolve over periods of months to years before affecting critically stressed faults.<sup>747</sup>

- September 14, 2016 – Researchers from the USGS used a newly deployed seismic monitoring network to document the rupture of a fault plane that set off a magnitude 4.9 earthquake in Milan, Kansas in 2014, immediately following a rapid increase in fracking wastewater injection nearby.<sup>748</sup>
- May 2016 – In a study that has “far-reaching implications for assessment of induced-seismicity hazards,” a Canadian team of researchers determined that hydraulic fracturing itself is linked to earthquake swarms in western Canada, in contrast to the central United States where disposal of fracking waste is the cause of most induced seismicity. Furthermore, lowering the volume of injected fluid may not be sufficient to prevent quakes. In the Western Canada Sedimentary Basin, “it appears that the maximum-observed magnitude of events associated with hydraulic fracturing may exceed the prediction of an often-cited relationship between the volume of injected fluid and the maximum expected magnitude.... Rather, we propose that the size of the available fault surface that is in a critical state of stress may control the maximum magnitude.... Our results indicate that the maximum magnitude of induced events for hydraulic fracturing may not be well correlated with net injected fluid volume.”<sup>749</sup>
- April 29, 2016 – Five small earthquakes in one 24-hour period originated in an area in Lawrence County, Pennsylvania near a fracking operation that was drilling into the deep Utica Shale at the time. Quoted in the *Pittsburgh Post-Gazette*, researchers noted that it is very difficult for operators to avoid areas with faults because their locations are very often unknown.<sup>750</sup>
- March 28, 2016 – A summary of the evidence linking drilling and fracking activities to earthquakes appeared in *Scientific American*. Emerging data suggests that pressure changes caused by fracking wastewater injection can migrate for years before encountering a geological fault and altering stresses in ways that allow for slippage. In this way, earthquake risks can spread out over both time and space—traveling for miles

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<sup>747</sup> Shirzaei, M., Ellsworth, W. L., Tiampo, K. F., Gonzalez, P. J., & Manga, M. (2016). Surface uplift and time-dependent seismic hazard due to fluid injection in eastern Texas. *Science*, 353(6306). doi: 10.1126/science.aag0262

<sup>748</sup> Choy, G. L., Rubenstein, J. L., Yeck, W. L., McNamara, D. E., Mueller, C. S., & Boyd, O. S. (2016). A rare moderate-sized (Mw 4.9) earthquake in Kansas: Rupture process of the Milan, Kansas, earthquake of 12 November 2014 and its relationship to fluid injection. *Seismological Research Letters*, 87. doi: 10.1785/0220160100

<sup>749</sup> Atkinson, G. M., Eaton, D. W., Ghofrani, H., Walker, D., Cheadle, B., Schultz, R. . . . Kao, H. (2016). Hydraulic fracturing and seismicity in the Western Canada Sedimentary Basin. *Seismological Research Letters*, 87(3). doi: 10.1785/0220150263

<sup>750</sup> Legere, L. (2016, April 29). State studying link between fracking, Lawrence County earthquakes. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/companies/2016/04/29/State-studying-link-between-fracking-and-Lawrence-County-earthquakes/stories/201604290099>

beyond the disposal well and persisting for a decade or more as injected fluids travel underground. In spite of increasing scientific clarity about these mechanisms, regulators have been slow to respond.<sup>751</sup>

- February 1, 2016 – An article in the *Texas Journal of Oil, Gas, and Energy Law* exhaustively reviewed the literature on earthquake activity in areas of six states (Arkansas, Colorado, Kansas, Ohio, Oklahoma, and Texas) where fracking takes place or drilling wastes are disposed underground and concluded that courts should impose strict liability for earthquake damage caused either by fracking itself or by the underground injection of fracking fluids. “Earthquakes sometimes occur when subsurface formations are properly fractured. Likewise, the risk of earthquake damage is not substantially mitigated by the exercise of due care when frack fluids are injected into the ground.”<sup>752</sup>
- January 22, 2016 – An international research team investigated a swarm of earthquakes in California’s Central Valley that occurred in 2005. Using hydrogeological modeling, the researchers concluded that the underground injection of wastewater from oil drilling operations had contributed to seismicity via changes in localized pressures along an active fault.<sup>753</sup>
- January 12, 2016 – As reported by *CBC News*, a Canadian regulatory agency ordered a drilling and fracking operation in northwestern Alberta to shut down after a magnitude 4.8 earthquake struck nearby. The operator was fracking at the time the earthquake happened.<sup>754</sup>
- November 15, 2015 – A spokesperson for the Oklahoma Corporation Commission, which regulates the oil and gas industry in the state, said that Oklahoma now leads the world in earthquake frequency.<sup>755</sup>
- October 29, 2015 – The Kansas Corporation Commission extended limits on the injection of wastewater from fracking operations after a drop in the frequency of earthquakes that followed an earlier order to limit such injections.<sup>756</sup> Between 2013 and October 2015,

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<sup>751</sup> Kuchment, A. (2016, March 28). Drilling for earthquakes. *Scientific American*. Retrieved from <https://www.scientificamerican.com/article/drilling-for-earthquakes/>

<sup>752</sup> Watson, B. A. (2016). Fracking and cracking: Strict liability for earthquake damage due to wastewater injection and hydraulic fracturing. *Texas Journal of Oil, Gas and Energy Law*, 11(1). Retrieved from <http://ssrn.com/abstract=2735862>

<sup>753</sup> Goebel, T. H. W., Hosseini, S. M., Cappa, F., Hauksson, E., Ampuero, J. P., Aminzadeh, F., & Saleeby J. B. (2016). Wastewater disposal and earthquake swarm activity at the southern end of the Central Valley, California. *Geophysical Research Letters*, 43. doi: 10.1002/2015GL066948

<sup>754</sup> *CBC News*. (2016, January 12). Fox Creek fracking operation closed indefinitely after earthquake. Retrieved from <http://www.cbc.ca/news/canada/edmonton/fox-creek-fracking-operation-closed-indefinitely-after-earthquake-1.3400605>

<sup>755</sup> Miller, J. (2016, November 10). Oklahoma world’s no. 1 earthquake area. *Enid News and Eagle*. Retrieved from [http://www.enidnews.com/news/local\\_news/oklahoma-world-s-no-earthquake-area/article\\_69b145b8-c180-5065-8f99-b2a7ec7ce913.html](http://www.enidnews.com/news/local_news/oklahoma-world-s-no-earthquake-area/article_69b145b8-c180-5065-8f99-b2a7ec7ce913.html)

<sup>756</sup> Kansas Corporation Commission. (2015, October 29). *Kansas Corporation Commission approves order extending wastewater injection limits*. [Press release.] Retrieved from <http://www.kcc.state.ks.us/pi/press/15-13.htm>

Kansas recorded more than 200 earthquakes. Before that, the average rate was one earthquake every two years.

- October 23, 2015 – *Bloomberg* explored the national security risks that fracking-induced earthquakes in Oklahoma create for the nation's largest oil storage hub in Cushing, where aboveground tanks hold more than 60 million barrels of crude oil and serve as a way station for oil from North Dakota's Bakken Shale as it heads to Gulf Coast refineries. Earthquake swarms have hit within a few miles of Cushing and may be harbingers of larger quakes in the future. "Now that quakes appear to have migrated closer to Cushing, the issue of what to do about them has morphed from a state issue to one of national security.... Not only is Cushing crucial to the financial side of the oil market, it is integral to the way physical crude flows around the country."<sup>757</sup>
- September 21, 2015 – An international team of geologists investigated possible causes of the Lusi mudflow, which began suddenly in 2006 when mud began erupting from the ground in a volcano-like fashion in an urban area of Java in Indonesia. The ongoing disaster has, as of 2015, displaced 39,700 people and cost nearly \$3 billion in damages and disaster management. Looking at data on the emissions of subsurface gases before and after the eruption began, the team concluded that the likely cause was nearby gas drilling that forced fluid into the clay layer via the open well. "We therefore conclude that the Lusi eruption was not triggered naturally but was instead the consequence of drilling operations."<sup>758</sup> In interviews with the *New York Times*, lead author Mark Tinjay said, "We are now 99 percent certain that the drilling hypothesis is valid," while other experts who were not authors of the paper expressed less certainty.<sup>759</sup>
- July 27, 2015 – During a seven-day period in late July, the state of Oklahoma experienced 40 earthquakes. According to the USGS, three registered above magnitude 4.0, one of which was strong enough to be felt by 1.9 million people, including residents of several surrounding states.<sup>760</sup> In response, gas and oil operators voluntarily shut down two nearby wastewater injection wells and reduced operations by half at a third well.<sup>761</sup> According to the Oklahoma Geological Survey, the recent quakes are occurring along a fault line that extends north of Oklahoma City and signal greater potential for a larger earthquake.<sup>762</sup> Ten days before the voluntary shutdowns, the Oklahoma Corporation Commission, which regulates the oil and gas industry, put 211 wastewater disposal wells

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<sup>757</sup> Phillips, M. (2015, October 23). Oklahoma earthquakes are a national security threat. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/articles/2015-10-23/oklahoma-earthquakes-are-a-national-security-threat>

<sup>758</sup> Tingay, M. R. P., Rudolph, M. L., Manga, M., Davies, R. J., & Wang, C-Y. (2015). Initiation of the Lusi mudflow disaster. *Nature Geoscience*, 8. doi:10.1038/ngeo2472

<sup>759</sup> Nuwer, R. (2015, September 21). Indonesia's 'mud volcano' and nine years of debate about its muck. *The New York Times*. Retrieved from <http://www.nytimes.com/2015/09/22/science/9-years-of-muck-mud-and-debate-in-java.html?rref=collection%2Fsectioncollection%2Fscience&r=0>

<sup>760</sup> U.S. Geological Survey, (2015, July 27). M4.5 – 6 km NNE of Crescent, Oklahoma. Retrieved from [http://earthquake.usgs.gov/earthquakes/eventpage/us200030gd#impact\\_pager](http://earthquake.usgs.gov/earthquakes/eventpage/us200030gd#impact_pager)

<sup>761</sup> Oklahoma Corporation Commission (2015, July 28). Media advisory: new actions taken in response to earthquake activity in the Crescent area. Retrieved from <http://www.occeweb.com/News/Crescent%20wells.pdf>

<sup>762</sup> Murphy, S. (2015, July 28). 2 injection wells shut down after Oklahoma quakes. *Associated Press*. Retrieved from <http://www.santacruzsentinel.com/business/20150728/2-injection-wells-shut-down-after-oklahoma-quakes>

under extra review.<sup>763</sup> The next month, Oklahoma regulators, acknowledging that previous efforts have been unsuccessful in reducing seismic activity, asked operators of 23 injection wells to decrease the amount of wastewater injected by 38 percent and signaled that more sweeping regulatory actions may follow.<sup>764</sup>

- July 1, 2015 – Two researchers, from the USGS and the Geological Survey of Canada, offered a summary of the history, basic geology, and engineering of fracking fluid injection and induced seismicity. Noting that since 2001 Oklahoma had experienced two earthquakes of very large magnitude (5.0 and 5.3), the authors called for “a detailed understanding of the physical processes involved in inducing large magnitude events and a detailed understanding of the geology and hydrology at the site of the earthquakes.” They also noted that many important parameters are either unknown or not easily constrained, making it “difficult to determine the wells that will induce earthquakes and those that will not.”<sup>765</sup>
- June 30, 2015 – The Oklahoma Supreme Court ruled that homeowners who have sustained injuries or property damage that they believe is due to earthquakes caused by oil and gas operations can sue for damages in state trial courts. The number of earthquakes with magnitude 3.0 or higher has skyrocketed in Oklahoma, with 1,100 predicted to occur in 2015. Earlier this year, scientists at the state’s geological survey reversed prior views and embraced the conclusion that the majority of the recent earthquakes in central and north-central Oklahoma were “very likely triggered” by underground wastewater disposal. Industry lawyers have complained that liability for such damages will be economically unsustainable. A separate class action lawsuit is planned.<sup>766</sup>
- June 19, 2015 – By compiling a database of 187,570 injection wells in the central and eastern United States, University of Colorado Boulder and USGS researchers were able to test for associations between fracking waste disposal and earthquakes. Results showed far more injection wells were potentially related to earthquakes than had previously been realized, and active disposal-only wells were more than 1.5 times more likely than active oil extraction wells to be associated with an earthquake. In addition, high-rate injection wells, receiving more than 300,000 barrels of fluid per month, were much more likely than lower-rate wells to be associated with an earthquake, while other factors, including wellhead injection pressure, appeared unrelated to increased earthquake activity. The

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<sup>763</sup> Oklahoma Corporation Commission (2015, July 17). *OCC announces next step in continuing response to earthquake concerns, 200-plus more disposal wells added to action list* [Press release]. Retrieved from <http://www.occeweb.com/News/DIRECTIVE-2.pdf>

<sup>764</sup> Wines, M. (2015, August 4). Oklahoma acts to limit earthquake risk at oil and gas wells. *The New York Times*. Retrieved from [http://www.nytimes.com/2015/08/05/us/oklahoma-acts-to-limit-earthquake-risk-at-oil-and-gas-wells.html?\\_r=0](http://www.nytimes.com/2015/08/05/us/oklahoma-acts-to-limit-earthquake-risk-at-oil-and-gas-wells.html?_r=0)

<sup>765</sup> Rubenstein, J. L., & Mahani, A. B. (2015). Myths and facts on wastewater injection, hydraulic fracturing, enhanced oil recovery, and induced seismicity. *Seismological Research Letters*, 86(4), 1060-1067. doi: 10.1785/0220150067

<sup>766</sup> Oppel Jr., R.A. (2015, June 30). Oklahoma court rules homeowners can sue oil companies over quakes. *The New York Times*. Retrieved from [http://www.nytimes.com/2015/07/01/us/oklahoma-court-rules-homeowners-can-sue-oil-companies-over-quakes.html?emc=edit\\_tnt\\_20150630&nid=66402583&ntemail0=y&\\_r=0](http://www.nytimes.com/2015/07/01/us/oklahoma-court-rules-homeowners-can-sue-oil-companies-over-quakes.html?emc=edit_tnt_20150630&nid=66402583&ntemail0=y&_r=0)



study called for managing injection rates as “a useful tool to minimize the likelihood of induced earthquakes.” The researchers did not address the impact of hydrofracturing activities *per se* as a potential confounding variable.<sup>767, 768</sup>

- June 18, 2015 – Close examination of several areas in Oklahoma by Stanford University geophysicists revealed that dramatic increases in recent earthquake activity followed 5- to 10-fold increases in deep-well injection of briny “produced water,” the highly salty fluid that rises to the surface from water-bearing oil reserves and requires disposal. The rate of earthquake occurrence, which began to increase in 2009, is now 600 times higher than it was before the onset of widespread fracking in the state. The disposal of this type of waste in Oklahoma mostly occurs via injection into geological formations that appear to be in hydraulic communication with potentially active faults in the crystalline basement. The study proposed that increasing pressure, spreading away from injection wells over time, could eventually trigger slips on critically stressed faults, resulting in earthquake activity. It is likely that, “even if injection from many wells were to stop immediately, seismicity would continue as pressure continues to spread out from past injection.”<sup>769</sup>
- June 12, 2015 – Researchers in France uncovered an unexpected mechanism by which subsurface fluid injections, such as those used in high volume hydrofracturing, can cause earthquakes. They found that injection of pressurized water can cause fault lines to “creep” rather than slip suddenly as occurs during earthquakes. Earthquakes did follow this slow movement but took place in a portion of the fault outside the pressurized zone. This research demonstrated that subsurface injection of fluids under pressure can cause primary gradual slippage of fault planes leading to secondary sudden seismic activity.<sup>770, 771</sup>
- June 11, 2015 – As reported by the Vancouver news magazine *The Tyee*, seismic events of magnitude greater than 2.0 (but less than 4.0) in the Fox Creek area were reported in Alberta, Canada since the initiation in February of a novel “traffic light system” for responding to measured seismic activity. The system requires varying responses according to the magnitude of the event, ranging from no action up to ceasing operations and informing the Alberta Energy Regulator for events at magnitudes greater than 4.0. Experts noted that the system does not work well when the largest event in the sequence is the first event. Moreover, once a sequence of earthquakes is initiated, the sequence

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<sup>767</sup> Weingarten, M. Ge, S., Godt, J. W., Bekins, B. A., & Rubinstein, J. L. (2015). High-rate injection is associated with the increase in U.S. mid-continent seismicity. *Science*, 348(6241), 1336-1340. doi: 10.1126/science.aab1345

<sup>768</sup> Rosen, J. (2015). Pumped up to rumble: Massive studies of wastewater injection wells show fast pumping raises earthquake risk. *Science*, 368(6241), 1299. doi: 10.1126/science.aac6857

<sup>769</sup> Walsh, F. R. III, & Zoback, M. D. (2015). Oklahoma’s recent earthquakes and saltwater disposal. *Science Advances*, 1(5), e1500195. doi: 10.1126/sciadv.1500195

<sup>770</sup> Guglielmi, Y., Cappa, F., Avouac, J.-P., Henry, P., & Elsworth, D. (2015). Seismicity triggered by fluid injection-induced aseismic slip. *Science*, 348(6240), 1224-1226. doi: 10.1126/science.aab0476

<sup>771</sup> Johnson, S. K. (2015, June 11). Making tiny earthquakes to understand fracking-driven quakes. *arstechnica*. Retrieved from <http://arstechnica.com/science/2015/06/making-tiny-earthquakes-to-understand-fracking-driven-quakes/>

may continue, sometimes with larger earthquakes, long after potentially causally related drilling or injection activities have ceased.<sup>772</sup>

- June 1, 2015 – In a data-rich presentation, a team of researchers from St. Louis University, Colorado State University, and USGS concluded that “a fundamental change in the earthquake-triggering process has occurred” in central Oklahoma. Using advanced field monitoring and high-performance software, computer models illustrate active earthquake sequences associated with long fault structures “that might be capable of supporting large earthquakes (M 5 to 6)” and possibly cascades of earthquakes, which could occur near population centers and expensive infrastructure associated with the oil and gas industry, such as a large underground crude-oil storage facility.<sup>773</sup>
- May 11, 2015 – A series of directives from the Oklahoma Corporation Commission revealed a slowly evolving approach to the regulation of disposal well operations in that state, and the gradual tightening of a “traffic light system” introduced in 2013 to determine whether disposal wells for fracking waste should be permitted, permitted only with special restrictions and requirements, or not permitted, in light of the now-proven connection between the injection of liquid waste and the soaring frequency of earthquakes in Oklahoma. Since 2013, earthquake activity in Oklahoma has continued to increase in rate and intensity.<sup>774, 775</sup>
- April 23, 2015 – In a first-of-its-kind approach, the USGS is updating its National Seismic Hazard Model to address the rapidly increasing, highly variable, and difficult-to-predict hazards of induced earthquakes.<sup>776</sup> This initial report identified 17 areas within eight states (Alabama, Arkansas, Colorado, Kansas, New Mexico, Ohio, Oklahoma, and Texas) with increased rates of induced seismicity, including many areas experiencing earthquakes of large magnitude.<sup>777</sup> Two days before the release of this report, Oklahoma’s state government acknowledged for the first time that wastewater disposal related to oil and gas drilling is “very likely” to blame for the huge surge of earthquakes

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<sup>772</sup> Nikiforuk, A. (2015, June 11). More industry linked earthquakes recorded in Alberta. *TheTyee.ca*. Retrieved from <http://thetyee.ca/News/2015/06/11/More-Fracking-Earthquakes/>

<sup>773</sup> McNamara, D. E., Rubinstein, J. L., Myers, E., Smoczyk, G., Benz, H. M., Williams, R. A., . . . Earle, P. (2015). Efforts to monitor and characterize the recent increasing seismicity in central Oklahoma. *The Leading Edge*, 34(6). doi: 10.1190/tle34060628.1

<sup>774</sup> Oklahoma Corporation Commission, Oil & Gas Conservation Division. (2015, May 11). Media advisory: Ongoing OCC earthquake response. Retrieved from <http://www.occeweb.com/News/2015/ADVISORY%20-%20TRAFFIC%20LIGHT.pdf>

<sup>775</sup> Oklahoma Corporation Commission. (n.d.) Seismic statement. Retrieved from <http://www.occ.state.ok.us/SeismicStatementB.pdf>

<sup>776</sup> Petersen, M. D., Mueller, C. S., Moschetti, M. P., Hoover, S. M., Rubinstein, J. L., Llenos, A. L., . . . Anderson, J. G. (2015). Incorporating induced seismicity in the 2014 United States National Seismic Hazard Model—Results of 2014 workshop and sensitivity studies: U.S. Geological Survey Open-File Report 2015–1070. doi: 10.3133/ofr20151070

<sup>777</sup> USGS. (2015, April 23). New insight on ground shaking from man-made earthquakes. *USGS Newsroom*. Retrieved from [http://www.usgs.gov/newsroom/article\\_pf.asp?ID=4202](http://www.usgs.gov/newsroom/article_pf.asp?ID=4202)

in many areas of Oklahoma, the *New York Times* reported.<sup>778</sup> Several states have developed protocols to shut down existing wells and halt drilling of new disposal wells following an upsurge in earthquake activity.

- April 21, 2015 – Analyzing the unusual increase of seismicity in north Texas since 2008, researchers from Southern Methodist University, the USGS, and University of Texas at Austin concluded that observed earthquake swarms were associated both with extraction (of gas and brine formation waters) and injection (of fracking wastewater), via significant stress changes at earthquake depths. The research team noted that baseline pressure monitoring data, though easy to obtain and routinely collected by industry at well sites, were currently “neither required nor typically available for analysis.” Greater transparency and cooperation in regional seismic monitoring is needed to generate more comprehensive data sets that are necessary for robust earthquake hazard analysis, they asserted.<sup>779, 780</sup>
- April 21, 2015 – In a statement reporting on an increase in earthquakes in Oklahoma of greater than magnitude 3.0 from less than two per year historically to over two per day in 2015, the Oklahoma Geological Society acknowledged that the primary, suspected source of “triggered seismicity” is the injection and disposal of produced water associated with oil and gas production.<sup>781</sup>
- March 30, 2015 – *Bloomberg Business* reported that Oklahoma state seismologists had received pressure from oil industry representatives to downplay the evidence linking fracking wastewater disposal to the soaring frequency of earthquakes in the state.<sup>782</sup>
- March 6, 2015 – A careful and detailed analysis of historical data coupled with onsite, real-time measurements of seismic activity in central Oklahoma via rapidly deployed seismic sensors revealed that reactivated ancient faults responsible for thousands of earthquakes in Oklahoma are capable of causing larger seismic events. Current hazard maps did not include induced seismicity and therefore underestimate earthquake hazard, the USGS reported. Until new hazard maps become available, providing information about the type, length, and location of these reactivated faults could provide guidance to the oil and gas industry and help inform public policy decisions.<sup>783</sup> In addition, noted lead

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<sup>778</sup> Pérez-Peña, R. (2015, April 23). U.S. maps pinpoint earthquakes linked to quest for oil and gas. *The New York Times*. Retrieved from [http://www.nytimes.com/2015/04/24/us/us-maps-areas-of-increased-earthquakes-from-human-activity.html?ref=us&\\_r=1](http://www.nytimes.com/2015/04/24/us/us-maps-areas-of-increased-earthquakes-from-human-activity.html?ref=us&_r=1)

<sup>779</sup> Hornbach, M. J., DeShon, H. R., Ellsworth, W. L., Stump, B. W., Hayward, C., Frohlich, C., . . . Luetgert, J.H. (2015). Causal factors for seismicity near Azle, Texas. *Nature Communications*, 6(6728). doi: 10.1038/ncomms7728

<sup>780</sup> Richter, M. (2015, April 21). Small north Texas quakes likely linked to oil, gas operations – study. *Reuters*. Retrieved from <http://www.reuters.com/article/2015/04/21/us-usa-texas-earthquake-idUSKBN0NC2DY20150421>

<sup>781</sup> Andrews, R.D. & Holland, A. (2015, April 21). Statement on Oklahoma Seismicity. Retrieved from [http://wichita.ogs.ou.edu/documents/OGS\\_Statement-Earthquakes-4-21-15.pdf](http://wichita.ogs.ou.edu/documents/OGS_Statement-Earthquakes-4-21-15.pdf)

<sup>782</sup> Elgin, B., & Phillips, M. (2015, March 30). Big oil pressured scientists over fracking wastewater’s link to quakes. *Bloomberg Business*. Retrieved from <http://www.bloomberg.com/news/articles/2015-03-30/big-oil-pressured-scientists-over-fracking-wastewater-s-link-to-quakes>

<sup>783</sup> McNamara, D. E., Benz, H. M., Herrmann, R. B., Bergman, E. A., Earle, P., Holland, A., . . . Gassner, A. (2015). Earthquake hypocenters and focal mechanisms in central Oklahoma reveal a complex system of reactivated subsurface strike-slip faulting. *Geophysical Research Letters*, 42(8), 2742–2749. doi: 10.1002/2014GL062730

author Dan McNamara, such information can “aid in adapting building codes to ensure that structures can withstand more damaging earthquakes.”<sup>784</sup>

- February 20, 2015 – Scientists with the USGS reported in *Science* about grappling with an unexpected increase in injection-related seismic activity across the middle of North America. In 2014, the number of measured earthquakes with magnitude of 3 or greater in Oklahoma exceeded that in California, and observations increasingly suggested that the effects of fluid injection were not confined to the target formation but instead were communicated, sometimes to greater depths, along pre-existing faults. Making hazard modeling more difficult, “most of these faults are only detected when they are imaged by well-located induced earthquakes.” Consequently, predicting and controlling such seismic activity may not be possible, leading to a recommendation that injection projects should be sited away from population centers.<sup>785</sup>
- February 5, 2015 – Citing an association between increased water use and fracking-induced seismic activity, a research scientist at the Geological Survey of Canada offered the quantity of water injected underground as his hypothesis for an observed increase in the frequency and magnitude of earthquake activity in areas near fracking wells. Although the Council of Canadian Academies in 2014 called for more monitoring and data collection, there are only ten monitoring stations in British Columbia, overseeing the operations of thousands of fracking wells, reported the *Vancouver Observer*.<sup>786</sup>
- January 29, 2015 – The industry-funded Alberta Energy Regulator confirmed that the location of an earthquake of magnitude 4.4 near Fox Creek, Alberta, was “consistent with being induced by hydraulic fracturing operations,” making it the largest felt earthquake yet believed to be related to fracking. Despite claims from industry that tremors related to deep-level fracking could never reach magnitudes that would allow them to be felt on the surface, Gail Atkinson, who holds the Canada Research Chair in Induced Seismicity Hazards at Western University in Ontario, noted, “With fracking, the magnitudes have been increasing every year.”<sup>787</sup>
- January 6, 2015 – Using a specialized program, Miami University researchers analyzed data from multiple seismic stations and determined that a cluster of 77 earthquakes in Poland Township, Ohio, which occurred over the course of a little more than a week, was related temporally and spatially to active hydraulic fracturing operations. When the fracturing operations were shut down, the rate of earthquake activity declined to only 6 events in the next 12 hours and only a single event over approximately the next two

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<sup>784</sup> Koontz, H. (2015, March 6). *Reawakened Oklahoma faults could produce larger future events* [Press release]. Retrieved from [http://www.usgs.gov/newsroom/article\\_pf.asp?ID=4144](http://www.usgs.gov/newsroom/article_pf.asp?ID=4144)

<sup>785</sup> McGarr, A., Bekins, B., Burkardt, N., Dewey, J., Earle, P., Ellsworth, W., Ge, S., ... Sheehan, A. (2015). Coping with earthquakes induced by fluid injection. *Science*, 347(6224), 830-831. doi: 10.1126/science.aaa0494

<sup>786</sup> Leahy, D. (2015, February 5). Fracking-induced earthquake puts B.C. gas bonanza on shaky ground. *Vancouver Observer*. Retrieved from <http://www.vancouverobserver.com/news/fracking-induced-earthquake-puts-bc-gas-bonanza-shaky-ground>

<sup>787</sup> Nikiforuk, A. (2015, January 29). Did Alberta just break a fracking earthquake world record? *TheTyee.ca*. Retrieved from [http://thetyee.ca/News/2015/01/29/Alberta-Fracking-Earthquake/?utm\\_source=fb-page-editor-post&utm\\_medium=fb-page&utm\\_campaign=fb-01-2015](http://thetyee.ca/News/2015/01/29/Alberta-Fracking-Earthquake/?utm_source=fb-page-editor-post&utm_medium=fb-page&utm_campaign=fb-01-2015)

months. Among this cluster of seismic activity, an earthquake of magnitude 3.0 ranks as one of the largest earthquakes in the United States to be induced by hydraulic fracturing. The mechanism for these earthquakes appears to be induction of slip along a pre-existing fault or fracture zone. Because “no known fault or historical seismicity had been [previously] identified in the area,” regulations prohibiting fracturing within three miles of a known fault would not have been protective.<sup>788, 789</sup>

- December 18, 2014 – In Canada, an investigation by the British Columbia Oil and Gas Commission found that induced seismicity in the Horn River Basin could be attributed both to wastewater disposal and to hydraulic fracturing operations. The Commission recommended mitigation of induced seismicity from wastewater disposal by “reducing injection rates, limiting the increase in [subsurface] reservoir pressure, and locating distal from faults,” among other mitigation techniques.<sup>790, 791</sup>
- October 23, 2014 – Researchers from USGS and the Global Seismological Services in Golden, Colorado, linked a 2011 magnitude 5.3 earthquake in Colorado, which damaged the foundations of several homes, to underground disposal of fracking wastewater. The study determined that the earthquake ruptured an 8-10 kilometer-long segment of normal faults—an unexpectedly long length for a magnitude 5.3 earthquake—suggesting that wastewater disposal may have triggered a low stress drop.<sup>792</sup> Lead author Bill Barnhart, a USGS geophysicist, told *Reuters*, “We saw a big increase in seismicity starting in 2001, including magnitude 5 earthquakes, in many locations in the basin, and that coincided with a surge in gas production and injection of wastewater.”<sup>793</sup>
- September 23, 2014 – Youngstown State University geologist Ray Beiersdorfer described increased seismic activity in Youngstown, Ohio in an essay that explores how fracking and fracking-related processes are causing “earthquake epidemics” across the United States.<sup>794</sup>

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<sup>788</sup> Skoumal, R. J., Brudzinski, M. R. & Currie, B. S. (2015). Earthquakes induced by hydraulic fracturing in Poland Township, Ohio. *Bulletin of the Seismological Society of America* 105(1). doi: 10.1785/0120140168

<sup>789</sup> Wines, M. (2015, January 10). New research links scores of earthquakes to fracking wells near a fault in Ohio. *The New York Times*. Retrieved from [http://www.nytimes.com/2015/01/08/us/new-research-links-scores-of-earthquakes-to-fracking-wells-near-a-fault-in-ohio.html?hp&action=click&pgtype=Homepage&module=first-column-region&region=top-news&WT.nav=top-news&assetType=nyt\\_now&r=0](http://www.nytimes.com/2015/01/08/us/new-research-links-scores-of-earthquakes-to-fracking-wells-near-a-fault-in-ohio.html?hp&action=click&pgtype=Homepage&module=first-column-region&region=top-news&WT.nav=top-news&assetType=nyt_now&r=0)

<sup>790</sup> BC Oil & Gas Commission (2014). *Investigation of observed seismicity in the Montney Trend*. Retrieved from <http://www.bcogc.ca/node/12291/download>

<sup>791</sup> Nikiforuk, A. (2015, January 10). Fracking industry shakes up Northern BC with 231 tremors. *TheTyee.ca*. Retrieved from [http://www.thetyee.ca/News/2015/01/10/Fracking\\_Industry\\_Shakes\\_Up\\_Northern\\_BC/](http://www.thetyee.ca/News/2015/01/10/Fracking_Industry_Shakes_Up_Northern_BC/)

<sup>792</sup> Barnhart, W. D., Benz, H.M., Hayes, G.P., Rubinstein, J.L., & Bergman, E. (2014), Seismological and geodetic constraints on the 2011 Mw5.3 Trinidad, Colorado earthquake and induced deformation in the Raton Basin, *Journal of Geophysical Research: Solid Earth*, 119, 7923–7933, doi: 10.1002/2014JB011227. Retrieved from <http://onlinelibrary.wiley.com/doi/10.1002/2014JB011227/abstract>

<sup>793</sup> Zuckerman, L. (2014, October 29). Gas wastewater likely triggered 2011 quake in Colorado: USGS. *Reuters*. Retrieved from <http://www.reuters.com/article/2014/10/29/us-usa-earthquake-colorado-idUSKBN0II2NP20141029>

<sup>794</sup> Beiersdorfer, R. (2014, September 23). View: On fracking, earthquakes and Indian Point. *Journal Online*. Retrieved from <http://www.lohud.com/story/opinion/contributors/2014/09/23/view-geologist-warns-fracking-ties-earthquakes/16100755/>

- September 15, 2014 – Researchers at the National Energy Technology Laboratory teamed up with researchers from industry and academia to publish data and analysis from a closely watched project that involved field monitoring of the induced fracturing of six horizontal Marcellus Shale gas wells in Greene County, Pennsylvania. Touted in earlier media reports as demonstrating that, during short-term follow-up, fracking chemicals injected into these six wells did not spread to overlying aquifers<sup>795</sup>, the study's most notable finding is striking documentation of fractures from three of the six wells extending vertically to reach above an overlying rock layer previously thought to create an impenetrable “frac barrier” (that is, an upper barrier to fracture growth). In one case, a fracture extended vertically 1,900 feet, a surprisingly far distance. No pre-existing fault had been detected at this location, suggesting that small “pre-existing fractures or small-offset (sub-seismic) faults may have focused the energy of hydraulic fractures on certain areas....” Perhaps because of the extremely small sample size and a design focused primarily on monitoring for potential gas and fluid migration, the study's analysis includes no discussion of the seismic relevance of extremely long, vertical induced fractures.<sup>796</sup>
- September 15, 2014 – Scientists from USGS ascribed causality to wastewater injection wells from coal-bed methane production for increases in seismic activity in New Mexico and Colorado and, in particular, for an earthquake that measured magnitude 5.3 in Colorado in 2011—the second largest earthquake to date for which there is clear evidence that the earthquake sequence was induced by fluid injection.<sup>797</sup>
- September 6, 2014 – The Ohio Department of Natural Resources suspended operations at two deep-injection wells for fracking wastewater near Warren in northeastern Ohio after discovering evidence that the operation possibly caused a magnitude 2.1 earthquake. The injection well operator, American Water Management Services, had recently received permission to increase pressures at the site of the wells. In 2012, Governor John Kasich had halted disposal of fracking wastewater surrounding a well site in the same region after a series of earthquakes were tied to a deep-injection well. The company that ran that well has disputed the link. The state placed seismic-monitoring devices in the Warren area under protocols adopted after the series of earthquakes in nearby Youngstown.<sup>798</sup>

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<sup>795</sup> Begos, K. (2014, July 19). DOE study: Fracking chemicals didn't taint water. *Associated Press*. Retrieved from <http://bigstory.ap.org/article/ap-study-finds-fracking-chemicals-didnt-spread>

<sup>796</sup> Hammack, R., Harbert, W., Sharma, S., Stewart, B. W., Capo, R. C., Wall, A. J., . . . Veloski, G. (2014). An evaluation of fracture growth and gas/fluid migration as horizontal Marcellus Shale gas wells are hydraulically fractured in Greene County, Pennsylvania. *NETL-TRS-3-2014: EPA Act Technical Report Series. US Dept of Energy, National Energy Technology Laboratory*: Pittsburgh PA. Retrieved from [http://www.netl.doe.gov/File%20Library/Research/onsite%20research/publications/NETL-TRS-3-2014\\_Greene-County-Site\\_20140915\\_1\\_1.pdf](http://www.netl.doe.gov/File%20Library/Research/onsite%20research/publications/NETL-TRS-3-2014_Greene-County-Site_20140915_1_1.pdf)

<sup>797</sup> Rubinstein, J. L., Ellsworth, W. L., McGarr, A., & Benz, H. M. (2014). The 2001-present induced earthquake sequence in the Raton Basin of Northern New Mexico and Southern Colorado [abstract]. *Bulletin of the Seismological Society of America*. Retrieved from <http://www.bssaonline.org/content/104/5/2162.abstract?stoc>

<sup>798</sup> Smyth, J. C. (2014, September 6). Ohio halts injections at two wells for fracking wastewater after quake. *Associated Press*. Retrieved from <http://www.dispatch.com/content/stories/local/2014/09/06/ohio-halts-2-wells-for-fracking-wastewater-after-quake.html>

- September 1, 2014 – Explaining the need for increased seismic monitoring, Andrew Beaton, Director of the Alberta Geological Survey, stated that over a long period of time, stresses increase in and around an injection wellbore. Seismic movement can be caused if the rate of injection is too fast or if there is a geological feature, such as a fault or fracture in nearby areas. Although Albertans in rural areas have been reporting for years that they can feel tremors under their feet near oil and gas activity, especially around areas of fracking, the Alberta Energy Regulator noted that deep well injections have been shown to create more of an earthquake hazard than hydraulic fracturing. Alberta experienced 819 earthquakes between 1918 and 2009. In comparison, Saskatchewan recorded 13 in the same time period and British Columbia recorded more than 1,200 earthquakes in 2007 alone. There are currently 24 seismic monitors in Alberta, which are tied into other networks, such as those belonging to Environment Canada, University of Calgary, and University of Alberta.<sup>799</sup>
- August 26, 2014 – In a first-of-its-kind lawsuit, a resident of Prague, Oklahoma, sued two energy companies after rocks fell from her chimney and injured her leg during an earthquake of greater than magnitude 5. The lawsuit claims that underground injection of fracking wastewater conducted by New Dominion LLC and Spess Oil Company has caused shifts in fault lines that have resulted in earthquakes.<sup>800</sup>
- July 31, 2014 – William Ellsworth, a research geophysicist at the USGS Earthquake Science Center, reported that USGS is developing a hazard model that takes induced earthquakes into account. In addition, residents of Oklahoma, where a sharp spike in earthquake activity has been noted over the past decade, are showing an increased interest in obtaining earthquake insurance.<sup>801</sup>
- July 3, 2014 – Using data from the Oklahoma Corporation Commission, a team of researchers led by Cornell University geophysicist Katie Keranen found that a steep rise in earthquakes in Oklahoma can be explained by fluid migration from wastewater disposal wells. Moreover, injected fluids in high volume wells triggered earthquakes over 30 kilometers (over 18 miles) away. All of the wells analyzed were operated in compliance with existing regulations. Similar mechanisms may function in other states with high volumes of underground injection of wastewater from unconventional oil and gas production.<sup>802</sup> Reporting on the study and the increase in earthquakes across the United States and the link to fracking and wastewater disposal, the *Associated Press*

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<sup>799</sup> Maclean, R. (2014, September 1). Earthquake hazard linked with deep well injection in Alberta: Deep well disposal of oilfield waste over time leads to increased earthquake risk. *CBC News*. Retrieved from <http://www.cbc.ca/news/canada/calgary/earthquake-hazard-linked-with-deep-well-injection-in-alberta-1.2751963>

<sup>800</sup> Rangel, L. (2014, August 26). Prague resident files lawsuit against two Okla. energy companies following earthquake injury. *Newschannel 4 (kfor.com)*. Retrieved from <http://kfor.com/2014/08/26/prague-resident-files-lawsuit-against-two-okla-energy-companies-following-earthquake-injury/>

<sup>801</sup> Eaton, J. (2014, July 31). Oklahoma grapples with earthquake spike—and evidence of industry's role: Spike in seismic activity is linked with oil and gas wastewater disposal. *National Geographic*. Retrieved from <http://news.nationalgeographic.com/energy/2014/07/140731-oklahoma-earthquake-spike-wastewater-injection/>

<sup>802</sup> Keranen, K. M., Weingarten, M., Abers, G. A., Bekins, B. A., & Ge, S. (2014). Sharp increase in central Oklahoma seismicity since 2008 induced by massive wastewater injection. *Science*, 345(6195), 448-451. doi: 10.1126/science.1255802

noted that some states, including Ohio, Oklahoma, and California, have introduced new rules compelling drillers to measure the volumes and pressures of their injection wells as well as to monitor seismicity during fracking operations.<sup>803</sup>

- July 1, 2014 – Seismologists linked the emergence of a giant sinkhole that formed in August 2012 near Bayou Corne in southeast Louisiana to tremors (earthquakes) caused by high-pressure pulses of either natural gas or water charged with natural gas. The surges of natural gas that caused the explosive tremors (earthquakes) may have weakened an adjacent salt cavern and caused its collapse. Alternatively, part of the salt cavern may have collapsed, causing a nearby gas pocket to give off surges of gas, later followed by the complete collapse of the salt cavern. These findings help illuminate the role of pressurized fluids in triggering seismic events.<sup>804</sup>
- June 24, 2014 – Following two earthquakes within a one-month period, the Colorado Oil and Gas Conservation Commission directed High Sierra Water Services to stop disposing wastewater into one of its Weld County injection wells. Monitoring by a team of seismologists from the University of Colorado had picked up evidence of continuing low-level seismic activity near the injection site, including a magnitude 2.6 event less than a month following a magnitude 3.4 earthquake that shook the Greeley area on May 31, 2014.<sup>805</sup>
- May 2, 2014 – The USGS and Oklahoma Geological Survey (OGS) jointly issued an official earthquake warning for Oklahoma, pointing out that the number of earthquakes in the state has risen 50 percent since just October—when the two agencies had issued a prior warning. The advisory stated that this dramatic increase in the frequency of small earthquakes “significantly increases the chance for a damaging quake in central Oklahoma.” Injection wells used for the disposal of liquid fracking waste have been implicated as the presumptive cause of the earthquake swarm. According to the OGS, about 80 percent of the state of Oklahoma is closer than ten miles from an injection well.<sup>806</sup> Since the joint earthquake advisory was released in May, the number of earthquakes in Oklahoma has continued to rise. During the first four months of 2014, Oklahoma had experienced 109 earthquakes of magnitude 3 or higher on the Richter

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<sup>803</sup> Schmall, E. & Jouzavavicius, J. (2014, July 14). States with fracking see surge in earthquake activity. *Associated Press*. Retrieved from [http://www.huffingtonpost.com/2014/07/14/fracking-earthquake\\_n\\_5585892.html](http://www.huffingtonpost.com/2014/07/14/fracking-earthquake_n_5585892.html)

<sup>804</sup> Nayak, A. & Dreger, D. S. (2014). Moment tensor inversion of seismic events associated with the sinkhole at Napoleonville Salt Dome, Louisiana. *Bulletin of Seismological Society of America* 104(4), 1763-1776. doi: 10.1785/0120130260

<sup>805</sup> Tomasic, J. (2014, June 24). Colorado drilling regulators halt injection-well activity in reaction to Greeley quake. *Colorado Independent*. Retrieved from <http://www.coloradoindependent.com/147934/colorado-drilling-regulators-halt-injection-well-activity-in-reaction-to-greeley-quake> (see also Baker, B. (2014, June 24). Colorado regulators halt fracking wastewater injection operation after earthquake strikes area for second time in a month. *Ecowatch*. Retrieved from <http://ecowatch.com/2014/06/24/colorado-wastewater-injection-earthquake/>)

<sup>806</sup> Geological Survey Joint Statement. (2014, May 2). Record number of Oklahoma tremors raises possibility of damaging earthquakes. United States Geological Survey. Retrieved from [http://earthquake.usgs.gov/regional/ceus/products/newsrelease\\_05022014.php](http://earthquake.usgs.gov/regional/ceus/products/newsrelease_05022014.php)



scale. By mid-June, the number of earthquakes had topped 200, exceeding the frequency of earthquakes in California.<sup>807</sup>

- May 2, 2014 – At the annual meeting of the Seismological Society of America, leading geologists warned that the risks and impacts of earthquakes from fracking and injection wells are even more significant than previously thought, pointing out that such earthquakes could occur tens of miles away from wells themselves, including quakes greater than magnitude 5.0. Justin Rubinstein, a research geophysicist at the USGS said, “This demonstrates there is a significant hazard. We need to address ongoing seismicity.”<sup>808</sup> Seismologist Gail Atkinson reported, “We don’t know how to evaluate the likelihood that a [fracking or wastewater] operation will be a seismic source in advance.”<sup>809</sup>
- April 11, 2014 – State geologists reported a link between fracking and a spate of earthquakes in Ohio, prompting the Ohio Department of Natural Resources to place a moratorium on drilling in certain areas and to require greater seismic monitoring.<sup>810</sup>
- April 3, 2014 – Researchers linked earthquakes in Mexico to fracking in the Eagle Ford Shale, which extends beneath both southern Texas and northern Mexico. They also noted a statistical correlation between seismic activity and fracking, particularly in the border state of Nuevo Leon, which registered at least 31 quakes between magnitude 3.1 and 4.3.<sup>811</sup>
- April 2014 – Researchers from the University of Alberta and the Alberta Geological Survey published a study in the *Journal of Geophysical Research* that found wastewater injection in Alberta is highly correlated with spikes of seismic activity between October 2006 and March 2012.<sup>812</sup> On November 13, 2014, *CBC News* reported on a more recent increase in earthquakes, which may also be linked to injection wells.<sup>813</sup>

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<sup>807</sup> Branson-Potts, H. (2014, June 17). Oklahoma coming to terms with unprecedented surge in earthquakes. *Los Angeles Times*. Retrieved from <http://www.latimes.com/nation/la-na-oklahoma-earthquakes-20140618-story.html#page=1>

<sup>808</sup> Walsh, B. (2014, May 1). The seismic link between fracking and earthquakes. *Time*. Retrieved June 9, 2014, from <http://time.com/84225/fracking-and-earthquake-link/>

<sup>809</sup> Kiger, P. J. (2014, May 2). Scientists warn of quake risk from fracking operations. *National Geographic*. Retrieved from <http://news.nationalgeographic.com/news/energy/2014/05/140502-scientists-warn-of-quake-risk-from-fracking-operations/>

<sup>810</sup> Dave, P. (2014, April 12). Ohio finds link between fracking and sudden burst of earthquakes. *Los Angeles Times*. Retrieved from <http://www.latimes.com/nation/nationnow/la-na-nn-ohio-finds-link-fracking-earthquakes-20140411-story.html#axzz2yrnpHW1h>

<sup>811</sup> Godoy, E. (2014, April 3). Fracking, seismic activity grow hand in hand in Mexico. *Inter Press Service*. Retrieved from <http://www.ipsnews.net/2014/04/fracking-seismic-activity-grow-hand-hand-mexico/>

<sup>812</sup> Schultz, R., Stern, V., & Gu, Y. J. (2014). An investigation of seismicity clustered near the Cordell Field, west central Alberta, and its relation to a nearby disposal well. *Journal of Geophysical Research: Solid Earth*, 119, 3410–3423. doi: 10.1002/2013JB010836

<sup>813</sup> Trynacity, K., & Siekierska, A. (2014, November 13). Fracking linked to Alberta earthquakes, study indicates. *CBC News*. Retrieved from <http://www.cbc.ca/news/canada/edmonton/fracking-linked-to-alberta-earthquakes-study-indicates-1.2829484>

- March 7, 2014 – USGS researchers published a study confirming that Oklahoma’s damaging magnitude 5.7 earthquake in 2011 was caused by fracking wastewater injection.<sup>814</sup> One of the authors of the study, seismologist Elizabeth Cochran, noted, “Even if wastewater injection only directly affects a low-hazard fault, those smaller events could trigger an event on a larger fault nearby.”<sup>815</sup>
- January 30, 2014 – A USGS research team linked the rise in earthquakes in Colorado to fracking wastewater injection wells and announced that a study will be published in six to nine months.<sup>816</sup>
- December 12, 2013 – The *New York Times* detailed the growing link between fracking wastewater injection wells and earthquakes, as well as between fracking itself and earthquakes, with a focus on Oklahoma and a recent magnitude 4.5 earthquake there. As the *New York Times* noted, “Oklahoma has never been known as earthquake country, with a yearly average of about 50 tremors, almost all of them minor. But in the past three years, the state has had thousands of quakes. This year has been the most active, with more than 2,600 so far, including 87 last week.... State officials say they are concerned, and residents accustomed to tornadoes and hail are now talking about buying earthquake insurance.”<sup>817</sup>
- November 19, 2013 – *Reuters* reported that a series of Oklahoma earthquakes in September of 2013 damaged several homes, and that more scientists in a number of states are concerned about earthquakes related to oil and gas development. Seismologist Austin Holland with the University of Oklahoma said, “This is a dramatic new rate of seismicity.”<sup>818</sup>
- July 19, 2013 – A study from the Lamont-Doherty Earth Observatory linked 109 earthquakes in Youngstown, Ohio to fracking wastewater disposal.<sup>819, 820</sup>
- July 11, 2013 – A study in *Science* by Columbia University’s Lamont-Doherty Earth Observatory showed that deep-well injection of fracking waste can stress geological

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<sup>814</sup> Sumy, D. F., Cochran, E. S., Keranen, K. M., Wei, M., & Abers, G. A. (2013). Observations of static Coulomb stress triggering of the November 2011 M5.7 Oklahoma earthquake sequence [Abstract]. *Journal of Geophysical Research: Solid Earth*, 119(3), 1904-1923. doi: 10.1002/2013JB010612

<sup>815</sup> Oskin, B. (2014, March 07). Wastewater injection triggered Oklahoma's earthquake cascade. *Live Science*. Retrieved from <http://www.livescience.com/43953-wastewater-injection-earthquake-triggering.html>

<sup>816</sup> McClurg, L. (2014, January 30). Earthquakes in southern Colorado linked to oil and gas production. *Colorado Public Radio*. Retrieved from <http://www.cpr.org/news/story/earthquakes-southern-colorado-linked-oil-and-gas-production#sthash.UVvw0JWe.UQwWtYJS.dpuf>

<sup>817</sup> Fountain, H. (2013, December 12). Experts eye oil and gas industry as quakes shake Oklahoma. *The New York Times*. Retrieved from <http://www.nytimes.com/2013/12/13/science/earth/as-quakes-shake-oklahoma-scientists-eye-oil-and-gas-industry.html>

<sup>818</sup> Gillam, C. (2013, November 19). In Oklahoma, water, fracking - and a swarm of quakes. *Reuters*. Retrieved from <http://www.reuters.com/article/2013/11/19/us-usa-earthquakes-fracking-oklahoma-idUSBRE9AI12W20131119>

<sup>819</sup> Kim, W. (2013). Induced seismicity associated with fluid injection into a deep well in Youngstown, Ohio. *Journal of Geophysical Research: Solid Earth*, 118(7), 3506-3518. doi: 10.1002/jgrb.50247

<sup>820</sup> Chameides, B. (2013, September 5). Fracking waste wells linked to Ohio earthquakes. *Scientific American*. Retrieved from <http://www.scientificamerican.com/article/fracking-waste-wells-linked-to-ohio-earthquakes/>

faults in ways that make them vulnerable to slipping. The research shows that distant natural earthquakes triggered swarms of smaller earthquakes on critically stressed faults. The researchers wrote, “The fluids [in wastewater injection wells] are driving the faults to their tipping point.... Areas with suspected anthropogenic earthquakes are more susceptible to earthquake-triggering from natural transient stresses generated by the seismic waves of large remote earthquakes.”<sup>821</sup>

- April 2013 – A group of British researchers stated that hydraulic fracturing itself was the likely cause of at least three earthquakes powerful enough to be felt by human beings at the surface. The researchers proposed that increases in the fluid pressure in fault zones were the causal mechanism for these three known instances of “felt seismicity” in the United States, Canada, and the United Kingdom. The largest of these earthquakes was a magnitude 3.8 in the Horn River Basin, Canada.<sup>822</sup>
- March 26, 2013 – Scientists from the University of Oklahoma, Columbia University and USGS linked a 2011 swarm of earthquakes in Oklahoma to fracking waste disposal in that state.<sup>823</sup> This included a magnitude 5.7 earthquake—possibly the largest ever triggered by wastewater injection—that injured two people, destroyed 14 homes, and was felt across 17 states.<sup>824</sup> The research team concluded in a paper in the journal *Geology* that their data called into question the previously predicted maximum size of injection-induced earthquakes.<sup>825, 826</sup>
- December 14, 2012 – At a 2012 American Geophysical Union meeting, scientists presented data and concluded that some U.S. states, including Oklahoma, Texas and Colorado, have experienced a significant rise in seismic activity coinciding with a boom in gas drilling, fracking and wastewater disposal. Scientists further found that Oklahoma has seen a significant increase in earthquakes linked to wastewater injection, that a 5.3 earthquake in New Mexico was linked to wastewater injection, and that earthquakes were increasingly common within two miles of injection wells in the Barnett Shale region of Texas. Art McGarr, a researcher at the USGS Earthquake Science Center, concluded that,

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<sup>821</sup> Begley, S. (2013, July 11). Study raises new concern about earthquakes and fracking fluids. *Reuters*. Retrieved from <http://www.reuters.com/article/2013/07/11/us-science-fracking-earthquakes-idUSBRE96A0TZ20130711>

<sup>822</sup> Davies, R., Foulger, G., Bindley, A., & Styles, P. (2013). Induced seismicity and hydraulic fracturing for the recovery of hydrocarbons. *Marine and Petroleum Geology*, 45, 171-185. doi: 10.1016/j.marpetgeo.2013.03.016

<sup>823</sup> Drajem, M., & Efstathiou, J., Jr. (2013, March 26). Quake tied to oil-drilling waste adds pressure for rules. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2013-03-26/oklahoma-earthquake-in-2011-tied-to-wastewater-wells-in-fracking.html>

<sup>824</sup> Behar, M. (2013, March/April). Fracking's latest scandal? Earthquake swarms. *Mother Jones*. Retrieved from <http://www.motherjones.com/environment/2013/03/does-fracking-cause-earthquakes-wastewater-dewatering?page=1>

<sup>825</sup> Keranen, K. M., Savage, H. M., Abers, G. A., & Cochran, E.S. (2013). Potentially induced earthquakes in Oklahoma, USA: Links between wastewater injection and the 2011 Mw 5.7 earthquake sequence. *Geology*. doi: 10.1130/G34045.1

<sup>826</sup> Diep, F. (2013, March 28). Study: wastewater injection caused Oklahoma's largest-ever earthquake. *Popular Science*. Retrieved from <http://www.popsoci.com/science/article/2013-03/largest-earthquake-ever-linked-lightly-regulated-wastewater-wells>

“The future probably holds a lot more in induced earthquakes as the gas boom expands.”<sup>827</sup>

- November 30, 2012, January 11, 2012, December 22, 2009 – In three different sets of comments on proposed fracking guidelines and regulations, citing scientific reports linking oil and gas infrastructure to seismic activity, the New York City Department of Environmental Protection (NYC DEP) raised serious concerns about the impacts of potential seismic activity from fracking-related activities on New York City’s water supply infrastructure.<sup>828, 829, 830</sup> The NYC DEP has consistently raised concerns that seismic activity surrounding New York City’s aquifers and watershed infrastructure could threaten the city’s drinking water supply by triggering microseismic events and small induced earthquakes that, in turn, could threaten the integrity of the aging, 100-mile-long aqueducts that carry drinking water from the Catskill Mountains into the New York City metropolitan area. The agency expressed specific concerns about the ability of hydraulic fracturing fluids to migrate underground and to intercept and reactivate faults miles away.
- September 6, 2012 – The British Columbia Oil and Gas Commission determined that fracking itself causes earthquakes, pointing to the results of a probe into 38 seismic events near fracking operations in the Horn River Basin. The report noted that no quakes had been recorded in the area prior to April 2009, before fracking began. The report recommended that the link between fracking and seismic activity be further examined.<sup>831</sup>
- March 29, 2012 – The USGS found that between 2001 and 2011, there was a six-fold increase in earthquakes greater than magnitude 3.0 in the middle of the United States that “are almost certainly manmade.” The agency further reported that the increase appears to be linked to oil and gas production and deep injection of drilling wastewater.<sup>832, 833</sup>

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<sup>827</sup> Leber, J. (2012, December 14). Studies link earthquakes to wastewater from fracking. *MIT Technology Review*. Retrieved from <http://www.technologyreview.com/news/508151/studies-link-earthquakes-to-wastewater-from-fracking/>

<sup>828</sup> New York City Department of Environmental Protection. (2009, December 22). *New York City comments on: Draft supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program - Well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus Shale and other low-permeability gas reservoirs* (Rep.). Retrieved from [http://www.nyc.gov/html/dep/pdf/natural\\_gas\\_drilling/nycdep\\_comments\\_final\\_12-22-09.pdf](http://www.nyc.gov/html/dep/pdf/natural_gas_drilling/nycdep_comments_final_12-22-09.pdf)

<sup>829</sup> New York City Department of Environmental Protection. (2012, January 11). *Comments on the revised draft supplemental generic environmental impact statement*. (Rep.). Retrieved from [http://www.nyc.gov/html/dep/pdf/natural\\_gas\\_drilling/nycdep\\_comments\\_on\\_rdsgeis\\_for\\_hvhf\\_20120111.pdf](http://www.nyc.gov/html/dep/pdf/natural_gas_drilling/nycdep_comments_on_rdsgeis_for_hvhf_20120111.pdf)

<sup>830</sup> New York City Department of Environmental Protection. (2012, November 30). *Comments on the revised high-volume hydraulic fracturing regulations* (Rep.). Retrieved from [http://www.nyc.gov/html/dep/pdf/natural\\_gas\\_drilling/revised\\_high\\_volume\\_hydraulic\\_fracturing\\_regulations\\_comments\\_letter\\_010713.pdf](http://www.nyc.gov/html/dep/pdf/natural_gas_drilling/revised_high_volume_hydraulic_fracturing_regulations_comments_letter_010713.pdf)

<sup>831</sup> The Canadian Press. (2012, September 6). Fracking causes minor earthquakes, B.C. regulator says. *CBC News*. Retrieved from <http://www.cbc.ca/news/canada/british-columbia/fracking-causes-minor-earthquakes-b-c-regulator-says-1.1209063>

<sup>832</sup> Ellsworth, W. (2011, April 18). Are seismicity rate changes in the midcontinent natural or manmade? Retrieved from [http://www2.seismosoc.org/FMPro?-db=Abstract\\_Submission\\_12&-sortfield=PresDay&-sortorder=ascending&-sortfield=Special+Session+Name+Calc&-sortorder=ascending&-sortfield=PresTimeSort&-](http://www2.seismosoc.org/FMPro?-db=Abstract_Submission_12&-sortfield=PresDay&-sortorder=ascending&-sortfield=Special+Session+Name+Calc&-sortorder=ascending&-sortfield=PresTimeSort&-)

- July 31, 2011 – Numerous earthquakes in Arkansas motivated the Arkansas Oil and Gas Commission to shut down a disposal well and enact a permanent moratorium on future disposal wells in a nearly 1,200 square-mile area of the Fayetteville Shale.<sup>834</sup>
- March 10, 2010 – In Texas, a 2008-2009 swarm of earthquakes in the Dallas-Fort Worth area was linked to produced water disposal wells.<sup>835</sup>
- June 12, 2009 – *The Wall Street Journal* reported that earthquakes shook Cleburne, Texas, a small town at the epicenter of fracking activity. More earthquakes were detected during that period of fracking activity than in the previous 30 years combined.<sup>836</sup>

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 recid=224&-format=%2Fmeetings%2F2012%2Fabstracts%2Fsessionabstractdetail.html&-lay=MtgList&-find

<sup>833</sup> Soraghan, M. (2012, March 29). 'Remarkable' spate of man-made quakes linked to drilling, USGS team says. *E&E Publishing, LLC*. Retrieved from <http://www.eenews.net/stories/1059962190>

<sup>834</sup> Zilk, C. (2011, July 31). Permanent disposal-well moratorium issued. *Arkansas Online*. Retrieved from <http://www.arkansasonline.com/news/2011/jul/31/permanent-disposal-well-moratorium-issued-20110731/>

<sup>835</sup> Frohlich, C., Hayward, C., Stump, B., & Potter, E. (2011). The Dallas-Fort Worth Earthquake Sequence: October 2008 through May 2009. *Bulletin of the Seismological Society of America*, 101(1), 327-340. doi: 10.1785/0120100131

<sup>836</sup> Casselman, B. (2009, June 12). Temblors rattle Texas town. *Wall Street Journal*. Retrieved from <http://online.wsj.com/news/articles/SB124476331270108225>

## Abandoned and active wells as pathways for gas and fluid migration

*Most fracking operations take place in oil and gas fields with a long history of conventional drilling and therefore with many abandoned wells. These can serve as potential pathways for contaminants to migrate vertically. Of the estimated 2.6 million oil and gas wells across the United States that are no longer in production, the location and status of the vast majority are not recorded in state databases, and most remain unplugged. Whether plugged or unplugged, abandoned wells are a significant source of methane leakage into the atmosphere and, based on findings from New York and Pennsylvania, may exceed cumulative total leakage from oil and gas wells currently in production. No state or federal agency routinely monitors methane leakage from abandoned wells. Abandoned wells also serve as underground pathways for fluid migration, heightening risks of groundwater contamination. Fluid can migrate upward through vertical channels when fractures from new drilling and fracking operations intersect with old wells. The most probable pathway of contaminant transport takes place outside the well casing. Industry experts, consultants, and government agencies including the U.S. Environmental Protection Agency (EPA), the U.S. Government Accountability Office (GAO), Texas Department of Agriculture, New York State Department of Environmental Conservation (NYS DEC), Pennsylvania Department of Environmental Protection (PA DEP), Illinois Environmental Protection Agency, and the British Columbia Oil and Gas Commission have all warned about problems with abandoned wells due to the potential for pressurized fluids and gases to migrate through inactive and, in some cases, active wells.*

- March 11, 2019 – There are roughly 200,000 abandoned oil and gas wells in Pennsylvania left over from more than a century of drilling. Most are not mapped. Alabama-based Diversified Gas & Oil, which now owns about 23,000 gas wells in the state, reached an agreement with the PA DEP to plug 1,400 abandoned wells over the next 15 years—or bring them back into production. The agreement requires the company to submit a \$7 million performance bond to cover the costs of plugging. In 2018, the company plugged 41 wells across its entire operating area.<sup>837</sup>
- March 5, 2019 – There are 30,000 abandoned oil wells in California, with 1,850 in Los Angeles County. The state is currently not required to report to the public on toxic air emissions from these wells before, during, or after they are plugged, even when idle wells are located within densely populated residential communities. The process of capping wells can itself release harmful gases. Legislation has been proposed to remediate this oversight.<sup>838</sup>
- February 21, 2019 – While preparing to mine over a natural gas storage field in Greene County, Pennsylvania, a coal company discovered dozens of undisclosed abandoned gas

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<sup>837</sup> Legere, L., & Litvak, A. (2019, March 11). Pa. strikes well-plugging deal with largest conventional oil and gas operator in Appalachia. *Pittsburgh Post-Gazette*. Retrieved from <https://www.post-gazette.com/business/powersource/2019/03/11/Diversified-Gas-and-Oil-abandoned-wells-plugging-settlement-Pennsylvania-DEP/stories/201903080130>

<sup>838</sup> Scauzillo, S. (2019, March 5). What toxins are being emitted from LA County's abandoned oil wells? A lawmaker wants to find out. Retrieved from <https://www.sgvtribune.com/tag/california-legislature/>

wells at the site, according to a report by the *Pittsburgh Post-Gazette*. “Pennsylvania’s history of fossil fuel extraction, combined with modern operations harvesting coal, oil and gas at different depths, makes it a particularly thorny place to work underground.”<sup>839</sup>

- January 25, 2019 – Colorado Governor John Hickenlooper signed an executive order to force the “plugging, remediation and reclamation of all medium- and high-priority orphaned wells and orphaned sites.” There are roughly 55,000 oil and gas wells in Colorado. At least 260 are orphaned, which means that the well’s owner cannot be identified, usually because of bankruptcy. Inactive wells that are orphaned become the responsibility of the state.<sup>840</sup>
- December 21, 2018 – Most fracking operations take place in oil and gas fields with a long history of conventional drilling and therefore with many abandoned wells. The possibility of hydraulic fractures intercepting these old wells and opening a pathway for rapid vertical transport for fluids to the surface or to groundwater aquifers depends on multiple variables. A University of Goettingen-led team used modeling to explore the relevant factors that predict long-term flow and transport of fracking fluids into groundwater aquifers through a leaky, abandoned well. The results showed that wellbore integrity of the abandoned well and its distance from the fracking operation are the two most influential parameters determining the vertical transport of fracking fluid through an abandoned well. The most probable pathway of contaminant transport takes place outside the well casing. Hydraulic fracking fluid tends to spread laterally when sediment layers are permeable, decreasing upward movement of fluid and decreasing contamination distribution in the aquifer. When freshwater aquifers are shallow, the short-term probability of contamination is negligible even in the presence of a leaky, abandoned well. “Model results show that hydraulic fracturing fluid reaches the aquifer three years after production.”<sup>841</sup>
- December 15, 2018 – A University of Vermont-led team explored the ability of various predictive models to forecast fluid migration from and through abandoned wells in Alberta, Canada. Although all the models “performed better than random guessing,” none of them perfectly predicted which wells would leak in part because of incomplete data. In Alberta, wells that do not leak at the time they are drilled are not retested until they are abandoned. Continuous monitoring of wells in a small area would allow the models to be retrained with more accurate information. Consistent with previous findings, the models

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<sup>839</sup> Legere, L. (2019, February 21). Pa. DEP threatened to shut down a gas storage field fearing risks to approaching coal mine. *Pittsburgh Post-Gazette*. Retrieved from <https://www.post-gazette.com/business/powersource/2019/02/21/coal-mine-natural-gas-storage-abandoned-wells-Pennsylvania-Equitrans-Consol/stories/201902200130>

<sup>840</sup> Staver, A. (2019, January 25). Hickenlooper signs order to release the locations of orphan wells, sets deadline to cap them. *Denver Post*. Retrieved from <https://www.denverpost.com/2018/07/18/hickenlooper-executive-order-orphan-wells/>

<sup>841</sup> Taherdangkoo, R., Tatomir, A., Anighoro, T., & Sauter, M. (2019). Modeling fate and transport of hydraulic fracturing fluid in the presence of abandoned wells. *Journal of Contaminant Hydrology*, 221, 58-68. Advance online publication. doi: 10.1016/j.jconhyd.2018.12.003

did show that the most important features in predicting whether an abandoned well will leak is the deviation of the well from vertical and the year the well was constructed.<sup>842</sup>

- November 20, 2018 – An investigation by WPXI, an NBC-affiliated television station in Pittsburgh, reported that Pennsylvania lacks funds to locate, plug, and remediate all potentially dangerous abandoned wells in the state. “Overall the problems could cost the state close to \$4 billion, so it is responding to the most critical cases first.”<sup>843</sup>
- November 20, 2018 – There are an estimated 12,000 abandoned wells in West Virginia, of which 4,000 are orphaned and have no owners, according to a story in the *Charleston Gazette-Mail* that reported how gas companies are saving money by leaving depleted wells behind instead of plugging them.<sup>844</sup>
- September 5, 2018 – An investigation of abandoned wells on Native American lands in the San Juan Basin found that the Bureau of Land Management (BLM), responsible for monitoring oil and gas wells on most tribal lands, has routinely failed to require operators to file paperwork on abandoned wells, lacks a clear strategy for identifying them, and does not prioritize cleaning up or remediating them.<sup>845</sup>
- May 16, 2018 – The GAO reported to Congress that BLM needs to improve its oversight of abandoned oil and gas wells. Companies are supposed to provide bonds up front to cover the costs of plugging abandoned wells and reclaiming the sites, but if they don’t, or if the costs exceed expectations, BLM can be liable and taxpayers can shoulder the clean-up costs. “Reclamation costs and potential liabilities likely increased since 2010, but we couldn’t determine how much because BLM does not systematically track the data.” The GAO recommended that, among other things, the director of BLM should systematically track the actual costs that the agency incurs when reclaiming orphaned wells, the number of orphaned and abandoned wells over time, and the information needed to determine the agency’s potential liabilities. The BLM concurred with the GAO’s recommendations. There are roughly 94,000 oil and gas wells on federal lands overseen by BLM.<sup>846</sup>
- Dec 26, 2017 – In 1965, a blowout at a gas well in northeastern Netherlands caused the formation of quicksand, which swallowed up an entire drill rig. Eventually, the area was

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<sup>842</sup> Montague, J. A., Pinder, G. F., & T. L. Watson. (2018). Predicting gas migration through existing oil and gas wells. *Environmental Geosciences*, 25(4), 121-132. doi: 10.1306/eg.01241817008

<sup>843</sup> WPXI (2018, November 20). Abandoned oil wells hidden under thousands of local properties. Retrieved from <https://www.wpxi.com/news/top-stories/abandoned-oil-wells-hidden-under-thousands-of-local-properties/875732284>

<sup>844</sup> Mishkin, K. (2018, November 20). Drilling companies avoiding responsibility to plug orphan wells, group says. *Charleston Gazette-Mail*. Retrieved from [https://www.wvgazettemail.com/news/drilling-companies-avoiding-responsibility-to-plug-orphan-wells-group-says/article\\_c423997f-d011-5e8a-a54f-13e54d3c0985.html](https://www.wvgazettemail.com/news/drilling-companies-avoiding-responsibility-to-plug-orphan-wells-group-says/article_c423997f-d011-5e8a-a54f-13e54d3c0985.html)

<sup>845</sup> Clarren, R. (2018, September 5). Idle oil, gas wells threaten Indian tribes while energy companies, regulators do little. *InvestigateWest*. Retrieved from <http://www.invw.org/2018/09/05/idle-oil-gas-wells-threaten-indian-tribes-while-energy-companies-and-regulators-do-little/>

<sup>846</sup> U.S. Government Accountability Office. (2018, May 16). *Oil and Gas Wells: Bureau of Land Management Needs to Improve its Data and Oversight of Its Potential Liabilities*. GAO-18-250. Retrieved from <https://www.gao.gov/assets/700/691810.pdf>



turned into a park. More than 50 years later, a team of researchers discovered that the site is still leaking methane. They found in the groundwater high levels of methane with an isotopic composition that matched that of the gas reservoir. An analysis of groundwater flow conditions showed that this methane is not a remnant of the blowout but the result of ongoing leakage. “Combined, the data reveal the long-term impact that underground gas well blowouts may have on groundwater chemistry, as well as the important role of anaerobic oxidation in controlling the fate of dissolved methane.”<sup>847, 848</sup>

- June 28, 2017 – *The Tyee* made public the results of an unreleased 2016 report by the Alberta Energy Regulator (AER) showing that 36 of 335 abandoned oil and gas wells that are located close to occupied buildings in urban areas of Alberta are leaking methane. Six abandoned wells were leaking at levels (10,000 ppm) that pose explosion risks and are considered life-threatening. (Natural background level is about 1.9 ppm.) Based on these findings, the report also estimated that 17,000 of 170,000 abandoned wells in rural Alberta were likely also leaking. The author of the unreleased report said in an interview with *The Tyee* that AER, a corporation that functions in part as a regulatory agency, does not have the capacity to evaluate the potential threat to public health and safety. “The expertise to assess the health risk of abandoned wells really doesn’t exist in house.”<sup>849, 850</sup>
- March 27, 2017 – In an experimental study, Canadian researchers injected methane gas into a shallow sand aquifer over a 72-day period and monitored methane migration for eight months. After 72 days, they found that half of the methane had vented into the atmosphere and half remained in the groundwater, traveling laterally a greater distance than expected and degrading at a rate less than expected. “Our findings demonstrate that even small-volume releases of methane gas can cause extensive and persistent free phase and solute plumes.”<sup>851, 852</sup>
- December 21, 2016 – The *Texas Tribune* investigated abandoned oil wells in Texas where the Texas Railroad Commission, which is charged with regulating the oil and gas industry, has tracked and mapped 6,628 unplugged, orphaned wells. The commission is struggling with a ballooning inventory of inactive, leaking wells and decreasing clean-up funds to deal with them. The most recent oil boom, involving horizontal drilling with fracking, added to the problem as drillers cut corners in the rush to bring oil to market.

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<sup>847</sup> Schout, G., Hartog, N., Hassanizadeh, S. M., & Griffioen, J. (2018). Impact of an historic underground gas well blowout on the current methane chemistry in a shallow groundwater system. *Proceedings of the National Academy of Sciences*, 115(2), 296-301. Advance online publication. doi: 10.1073/pnas.1711472115

<sup>848</sup> Yirka, B. (2017, December 29). Methane still leaking from the ground at site of gas explosion decades ago. *Phys.org*. Retrieved from <https://phys.org/news/2017-12-methane-leaking-ground-site-gas.html>

<sup>849</sup> Nikiforuk, A. (2017, June 28). Energy industry legacy: Hundreds of abandoned wells leaking methane in Alberta communities. *The Tyee*. Retrieved from <https://thetyee.ca/News/2017/06/28/Energy-Industry-Legacy/>

<sup>850</sup> Nikiforuk, A. (2017, July 4). Alberta failing on risk from leaking oil and gas wells, says expert. *The Tyee*. Retrieved from <https://thetyee.ca/News/2017/07/04/Alberta-Failing-Leaking-Oil-Gas-Wells-Risk/>

<sup>851</sup> Cahill, A. G., Steelman, C. M., Forde, O., Kuloyo, O., Ruff, S. E., Mayer, B., . . . Parker, B. L. (2017). Mobility and persistence of methane in groundwater in a controlled-release field experiment. *Nature Geoscience*, 10, 289–294. doi: 10.1038/ngeo2919

<sup>852</sup> Nikiforuk, A. (2017, April 11). Methane leaks from energy wells affects groundwater, travels great distances, study confirms. *The Tyee*. Retrieved from <https://thetyee.ca/News/2017/04/11/Methane-Leaks-from-Energy-Wells-Affects-Groundwater/>

“Just drill the well as fast as possible, because they were under such pressure to get cash flow going,” according to a geoscientist interviewed for the story who had recently retired as a groundwater advisor for the Railroad Commission.<sup>853</sup>

- November 14, 2016 – Methane emissions from abandoned wells vary widely, with a few high emitters responsible for a disproportionately large share of the problem. Using new field measurement and data mining techniques, a Stanford University-led team investigated gas leaks at 88 inactive wells in Pennsylvania in an attempt to identify the characteristics of these “super-emitters.” Their results showed that unplugged gas wells and wells located in coal areas had the highest methane flow rates. Well plugging does not always reduce methane emission, especially when the wells are vented. In many areas with extensive coal layers, decommissioning requirements for wells included mandatory venting. Using comprehensive databases, the team also estimated the number of abandoned wells in Pennsylvania to be between 470,000 and 750,000, considerably more than previous estimates of 300,000 to 500,000. The research team calculated that, all together, Pennsylvania’s abandoned wells contribute 5-8 percent of the state’s annual greenhouse gas emissions.<sup>854, 855</sup>
- June 20, 2016 – Pennsylvania’s attorney general began reviewing regulations requiring drillers to document abandoned oil and gas wells within 1,000 feet of a new fracking site. According to a *Bloomberg* investigation, “This puts Pennsylvania among states such as California, Texas, Ohio, Wyoming and Colorado confronting the environmentally catastrophic legacy of booms as fracking and home development expand over former drilling sites. As the number of fracked wells increases, so does the chance they might interact with lost wells.” As noted by *Bloomberg*, state databases document only about 10 percent of the nation’s 2.6 million abandoned oil and gas wells; the whereabouts of the vast majority are unknown. Current efforts in Pennsylvania to increase documentation on the location and status of inactive wells rely on “citizen scientists” equipped with GPS and methane sniffers, as well as home and farm-owners living on top of abandoned wells. Over a period of three decades, PA DEP has located and plugged only about 3,000 abandoned wells.<sup>856</sup>
- May 30, 2016 – New developments of houses, schools, and shopping centers are being built over abandoned oil and gas wells, according to a report by Wyoming Public Media. In most states there is no requirement for homeowners to be notified about abandoned

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<sup>853</sup> Malewitz, J. (2016, December 21). Abandoned Texas oil wells seen as “ticking time bombs” of contamination. *Texas Tribune*. Retrieved from <https://www.texastribune.org/2016/12/21/texas-abandoned-oil-wells-seen-ticking-time-bombs/>

<sup>854</sup> Kang, M., Christian, S., Celia, M. A., Mauzerall, D. L., Bill, M., Miller, A. R., . . . Jackson, R. B. (2016). Identification and characterization of high methane-emitting abandoned oil and gas wells. *Proceedings of the National Academy of Sciences*, 113(48), 13636-13641. doi: 10.1073/pnas.1605913113

<sup>855</sup> Than, K. (2016, November 14). Stanford study of abandoned oil and gas wells reveals new ways of identifying and fixing the worst methane emitters. *Stanford News*. Retrieved from <https://news.stanford.edu/2016/11/14/study-abandoned-oil-gas-wells-reveals-new-ways-fixing-worst-methane-emitters/>

<sup>856</sup> Oldham, J. (2016, June 20). In the birthplace of U.S. oil, methane gas is leaking everywhere. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/articles/2016-06-20/in-the-birthplace-of-u-s-oil-methane-gas-is-leaking-everywhere>

wells on their properties, and these wells are not systematically monitored for leaks, nor are their locations well mapped. A builder who worked in the oil and gas industry for decades and suffered cardiac arrest when methane from an abandoned well he was inadvertently working atop exploded, said that there were “no signs” that a well was there.<sup>857</sup>

- January 26, 2016 – Researchers tested soil methane levels at 102 United Kingdom decommissioned oil and gas wells between 8 and 79 years old. Thirty percent of the wells had methane at the soil surface that was significantly higher than their control samples in nearby fields. Thirty-nine percent of well sites had significantly lower surface soil methane than their respective controls. Researchers suggested several explanations for the latter results, including replaced soils.<sup>858</sup>
- October 20, 2015 – Abandoned oil and gas wells near fracking sites can be conduits for methane escape that is not currently being measured, according to University of Vermont researchers. Fractures in the surrounding rock may connect to existing unused oil and gas wells in the area during fracking processes, thus providing a pathway for methane to migrate to the surface. The study used a mathematical model based on the large part of southern New York State underlain by the Marcellus Shale, incorporating “the depth of a new fracturing well, the vertical growth of induced fractures, and the depths and locations of existing nearby wells.” The researchers concluded the probability that new fracking-induced fractures would connect to a pre-existing well to be .03 percent to 3 percent. Density of nearby abandoned wells was the largest factor, and researchers pointed out the continuing problem of undocumented abandoned wells.<sup>859</sup> As noted in an accompanying press release, probabilities are likely much higher: “Industry-sponsored information made public since the paper was published vastly increased assumptions about the area impacted by a set of six to eight fracking wells known as a well pad – to two square miles – increasing the probabilities cited in the paper by a factor of 10 or more.”<sup>860</sup>
- July 9, 2015 – As part of an extensive, peer-reviewed assessment of fracking in California, the California Council on Science and Technology identified leakage through failed, inactive wells as a known mechanism for fracking-related water contamination in other states, including Texas and Ohio, and said that it is not known whether abandoned wells in California likewise function as conduits for groundwater contamination and gas leakage. In California, there are more inactive than active wells. Of the state’s nearly one-quarter million oil and gas wells, more than half (116,000) have been plugged and abandoned, while another 1,800 inactive wells are “buried” with only an approximate

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<sup>857</sup> Editor. (2016, May 30). Danger below? New properties hide abandoned oil and gas wells. *Wyoming Public Media*. Retrieved from <http://wyomingpublicmedia.org/post/hidden-abandoned-dangerous-old-gas-and-oil-wells-neighborhoods>

<sup>858</sup> Boothroyd, I. M., Almond, S., Qassim, S. M., Worrall, F., & Davies, R. J. (2016). Fugitive emissions of methane from abandoned, decommissioned oil and gas wells. *Science of the Total Environment*, 547, 461-469. doi: 10.1016/j.scitotenv.2015.12.096

<sup>859</sup> Montague, J. A., & Pinder, J. F. (2015). Potential of hydraulically induced fractures to communicate with existing wellbores. *Water Resources Research*, 51, 8303–8315. doi: 10.1002/2014WR016771

<sup>860</sup> Newswise. (2015, October 20). Dirty pipeline: Methane from fracking sites can flow to abandoned wells, new study shows. *Newswise*. Retrieved from <http://www.newswise.com/articles/view/641581/>

location known. The locations of another 338 old wells are entirely unknown. California also has 110 orphaned wells, that is, abandoned wells with no owners. Most of California's abandoned wells (53 percent) are located in Kern County.<sup>861</sup>

- May 11, 2015 – *CBC News* reported that falling gas and oil prices have prompted many smaller companies to abandon their operations in Alberta, Canada, leaving the provincial government to close down and dismantle their wells. In the past year alone, the number of orphaned wells in Alberta increased from 162 to 702. At the current rate of work, deconstructing the inventory of wells abandoned just in the past year alone will be a 20-year task.<sup>862</sup>
- April 27, 2015 – In a peer-reviewed study, researchers with the U.S. Fish and Wildlife Service documented 5,002 wells located on National Wildlife Refuge System units, in addition to 1,339 miles of pipeline. Almost half of the wells were inactive, while one-third were active and the remainder either plugged and abandoned or with status unknown. Highlighting the impacts of leaks, spills, and routine operation and maintenance on wildlife conservation efforts, the authors called for regular on-site ecological assessments, improved efforts to plug inactive wells and restore inactive well sites, and a “consolidated and robust regulatory framework” to protect the public's interests.<sup>863</sup>
- March 24, 2015 – Analyzing data from 42 abandoned oil and gas wells in western Pennsylvania, a Princeton and Stanford team documented a wide range of leakage potentials. As a group, gas wells have higher permeability than oil wells. Among gas wells, methane flow rates are positively correlated with permeability. Subterranean temperatures and temperatures, along with well depth, are all variables that can influence leakage potentials of abandoned wells. The leakage potential of wells drilled prior to 1960 is moderate to high, and plugged wells, as well as unplugged wells, can leak. The authors note that cement plugs are imperfect barriers that can develop defects that allow fluids to flow through gaps between the plug and surrounding hole, through pores or fissures within the plug itself, or directly through cracks in the well casing.<sup>864</sup>
- December 8, 2014 – A Princeton University team found that abandoned oil and gas wells in Pennsylvania, left over from prior decades of conventional drilling, leak significantly more methane than previously thought. Between 300,000 and 500,000 abandoned oil and gas wells are located in Pennsylvania, and many go unchecked and unmonitored for

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<sup>861</sup> Stringfellow, W. T., Cooley H., Varadharajan, C., Heberger, M., Reagan, M. T., Domen, J.K., . . . Houseworth, J. E. (2015, July 9). Volume II, Chapter 2: Impacts of well stimulation on water resources. In: *An Independent Scientific Assessment of Well Stimulation in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from <http://ccst.us/publications/2015/vol-II-chapter-2.pdf>

<sup>862</sup> Johnson, T. (2015, May 11). Alberta sees huge spike in abandoned oil and gas wells. *CBC News*. Retrieved from <http://www.cbc.ca/news/canada/calgary/alberta-sees-huge-spike-in-abandoned-oil-and-gas-wells-1.3032434>

<sup>863</sup> Ramirez Jr., P., & Mosley, S. B. (2015). Oil and gas wells and pipelines on U.S. wildlife refuges: Challenges for managers. *PLoS ONE*, 10(4). doi: 10.1371/journal.pone.0124085

<sup>864</sup> Kang, M., Baik, E., Miller, A. R., Bandilla, K. W., & Celia, M. A. (2015). Effective permeabilities of abandoned oil and gas wells: analysis of data from Pennsylvania. *Environmental Science & Technology*, 49(7). doi: 10.1021/acs.est.5b00132

leaks. Nearly three-quarters are unplugged. Based on direct measurements of methane flow from 19 such wells, most of which were a half century old or older, the researchers estimated that the methane leaks from abandoned wells alone could account for between 4 and 7 percent of human-caused methane emissions in the state. Based on these measurements of positive methane flow from decades-old wells, the authors concluded that cumulative emissions from these abandoned wells “may be significantly larger than the cumulative leakage associated with oil and gas production, which has a shorter lifetime of operation.” Further, methane flow rates from plugged wells measured in this study were not consistently lower than unplugged wells and indeed were sometimes higher, even though wells are plugged for the precise purpose of limiting the escape of gases. The authors noted that an estimated three million abandoned oil and gas wells are scattered across the United States and likely represent “the second largest potential contribution to total US methane emissions above US Environmental Protection Agency estimates.” In the United States, no regulatory requirements for monitoring methane leaks from abandoned wells exist.<sup>865, 866</sup>

- December 1, 2013 – An analysis of reports from the NYS DEC found that three-quarters of the state’s abandoned oil and gas wells were never plugged. New York State has approximately 48,000 such wells; many of their locations remain unknown.<sup>867</sup>
- Aug. 4, 2011 – A report from the EPA to Congress in 1987—and discovered by the *New York Times*—concluded that abandoned natural gas wells may have served as a pathway for hydraulic fracturing fluids to migrate underground from a shale gas well to a water well in West Virginia. In noting that the water well was polluted due to hydraulic fracturing and that such contamination was “illustrative” of contamination from oil and natural gas drilling, the report suggested that additional cases of groundwater contamination from hydraulic fracturing may exist.<sup>868</sup>
- April 4, 2011 – *ProPublica* reported that abandoned wells have caused problems across the nation including contamination of drinking water in Colorado, Kentucky, Michigan, New York, Texas, and other states. *ProPublica* also found that a draft report from the Pennsylvania DEP described a 2008 incident in Pennsylvania in which a person died in an explosion triggered by lighting a candle in a bathroom after natural gas had seeped into a septic system from an abandoned well. The same draft report documented at least two dozen additional cases in which gas leaked from old wells, and three in which gas

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<sup>865</sup> Kang, M., Kanno, C. M., Reid, M. C., Zhang, X., Mauzerall, D. L., Celia, M. A., . . . Onstott, T. C. (2014). Direct measurements of methane emissions from abandoned oil and gas wells in Pennsylvania. *Proceedings of the National Academy of Sciences*. Advance online publication. doi: 10.1073/pnas.1408315111

<sup>866</sup> Magill, B. (2014, June 19). Derelict oil wells may be major methane emitters. *Climate Central*. Retrieved from <http://www.climatecentral.org/news/abandoned-oil-wells-methane-emissions-17575>

<sup>867</sup> Bishop, R. E. (2014). Historical analysis of oil and gas well plugging in New York: Is the regulatory system working? *New Solutions: A Journal of Environmental and Occupational Health Policy*, 21, 103-116. Retrieved from <http://baywood.metapress.com/media/16ut607yqg1yrw9ydad3/contributions/b/0/4/7/b047j34r87552325.pdf>

<sup>868</sup> Urbina, I. (2011, August 4). A tainted water well, and concern there may be more. *The New York Times*. Retrieved from <http://www.nytimes.com/2011/08/04/us/04natgas.html>

from new wells migrated into old wells, seeping into water supplies and requiring the evacuation of homes.<sup>869</sup>

- May 20, 2010 – The British Columbia Oil and Gas Commission issued a safety advisory after hydraulic fracturing caused a large “kick,” or unintentional entry of fluid or gas, into a nearby gas well. The commission reported that it knew of 18 incidents in British Columbia and one in Western Alberta in which hydraulic fractures had entered nearby gas wells. “Large kicks resulted in volumes up to 80 cubic meters [about 100 cubic yards] of fluids produced to surface. Invading fluids have included water, carbon dioxide, nitrogen, sand, drilling mud, other stimulation fluids and small amounts of gas.” These cases occurred in horizontal wells with a distance between wellbores of up to 2,300 feet. The Commission wrote, “It is recommended that operators cooperate through notifications and monitoring of all drilling and completion operations where fracturing takes place within 1000m [3,280 feet] of well bores existing or currently being drilled.” Such communication between active wells raises the potential that similar communication can occur between active wells and abandoned wells.<sup>870</sup>
- 2010 – The NYS DEC cautioned that “abandoned wells can leak oil, gas and/or brine; underground leaks may go undiscovered for years. These fluids can contaminate ground and surface water, kill vegetation, and cause public safety and health problems.” As the agency reported, “DEC has at least partial records on 40,000 wells, but estimates that over 75,000 oil and gas wells have been drilled in the State since the 1820s. Most of the wells date from before New York established a regulatory program. Many of these old wells were never properly plugged or were plugged using older techniques that were less reliable and long-lasting than modern methods.”<sup>871</sup> The agency published similar comments in 2008 and 2009.
- January 2009 – In a presentation before the Society of Petroleum Engineers, industry consultant Michael C. Vincent reported on evidence that fractures from hydraulically fractured wells can communicate with nearby oil and gas wells. In spite of numerous examples of fractures intersecting with adjacent wellbores, the industry is reluctant to publish reports documenting these cases because “such information could unnecessarily alarm regulators or adjacent leaseholders.” Vincent added, “Although computing tools have improved, as an industry we remain incapable of fully describing the complexity of the fracture, reservoir, and fluid flow regimes.” These findings raise the possibility that there could be similar communications between existing fracked wells that are fractured and abandoned wells and that operators cannot accurately predict how these will interact.<sup>872</sup>

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<sup>869</sup> Kusnetz, N. (2011, April 4). Danger in honeycomb of old wells. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/nation/2011/04/04/Danger-in-honeycomb-of-old-wells/stories/201104040149>

<sup>870</sup> British Columbia Oil & Gas Commission. (2010, May 20). Safety advisory: Communication during fracture stimulation. Retrieved from <https://www.bcogc.ca/node/5806/download>

<sup>871</sup> New York State Department of Environmental Conservation. (2010). New York oil, gas and mineral resources 2010. Retrieved from [http://www.dec.ny.gov/docs/materials\\_minerals\\_pdf/10anrpt1.pdf](http://www.dec.ny.gov/docs/materials_minerals_pdf/10anrpt1.pdf)

<sup>872</sup> Vincent, M. C. (2009, January 19). Examining our assumptions – Have oversimplifications jeopardized our ability to design optimal fracture treatments? Lecture presented at Society of Petroleum Engineers hydraulic

- 2005 – M.K. Fisher, Vice President of Business Management at Pinnacle, a service of Halliburton that specializes in hydraulic fracturing, reported in an article published by the Society of Petroleum Engineers that a single fracture produced during a fracking operation in the Texas Barnett Shale had unexpectedly spread 2,500 feet laterally in two directions. He also described fractures in the Barnett Shale as “extremely complex.”<sup>873</sup> These findings raise the possibility that well communication over very large distances could occur due to fractures that spread “unexpectedly.”
- October 1999 – The U.S. Department of Energy reported that there were approximately 2.5 million abandoned oil and gas wells in the U.S.<sup>874</sup>
- Early 1990s – An underground waste disposal well in McKean County, Pennsylvania, contaminated groundwater when the wastewater traveled up a nearby abandoned, unmapped, and unplugged oil well. Owners of private water wells that were contaminated by the incident eventually had to be connected to a public water system.<sup>875</sup>
- July 1989 – In the past, the investigative agency for Congress, the U.S. General Accounting Office (now the Government Accountability Office—GAO) studied oil and natural gas underground injection disposal wells and found serious cases of contamination. The agency reported that, in several cases, wastewater from oil and natural gas operations had migrated up into abandoned oil and natural gas wells, contaminating underground water supplies. The GAO found that “if these abandoned wells are not properly plugged—that is, sealed off—and have cracked casings, they can serve as pathways for injected brines [waste fluids from natural gas and oil drilling] to enter drinking water.... Because groundwater moves very slowly, any contaminants that enter it will remain concentrated for long periods of time, and cleanup, if it is technically feasible, can be prohibitively costly.”<sup>876</sup>
- December 1987 – The EPA submitted a report to Congress on oil and natural gas wastes in which the agency cautioned that abandoned wells must be plugged with cement in order to avoid “degradation” of ground and surface waters as a result of pressurized brine or injected waste from wastewater disposal wells migrating into to aquifers, rivers, or

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fracturing technology conference in The Woodlands, Texas. Retrieved from <http://www.spe.org/dl/docs/2010/MikeVincent.pdf>

<sup>873</sup> Fisher, M., Wright, C., Davidson, B., Steinsberger, N., Buckler, W., Goodwin, A., & Fielder, E. (2005). Integrating fracture-mapping technologies to improve stimulations in the Barnett Shale. *SPE Production & Facilities*, 20(2). doi: 10.2118/77441-PA

<sup>874</sup> United States Department of Energy, Office of Fossil Energy. (1999, October 5). *Environmental benefits of advanced oil and gas exploration and production technology*. (Rep.). Retrieved from <http://www.netl.doe.gov/kmd/cds/disk25/oilandgas.pdf>

<sup>875</sup> Hopey, D. (2012, January 3). Wastewater disposal wells under scrutiny following Irvin leak. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/news/environment/2012/01/03/Wastewater-disposal-wells-under-scrutiny-following-Irvin-leak.html>

<sup>876</sup> United States Government Accountability Office. (1989, July 5). Drinking water: Safeguards are not preventing contamination from injected oil and gas wastes. Retrieved from <http://www.gao.gov/products/RCED-89-97>. (2, 4, Rep.).

streams.<sup>877</sup> While the EPA did not address the potential for contamination through abandoned wells as a result of hydraulic fracturing, both hydraulic fracturing and underground injection disposal wells require underground injection of fluid under pressure, raising the potential that there is a similar risk of groundwater contamination when hydraulic fracturing occurs near abandoned wells.

- 1985 – In an investigation of 4,658 complaints due to oil and natural gas production, the Texas Department of Agriculture found that “when a water well is experiencing an oilfield pollution problem (typically, high chlorides), the pollution source is often difficult to track down. The source could be a leak in the casing of a disposal well, leakage behind the casing due to poor cement bond, old saltwater evaporation pits, or, most often, transport of contaminants through an *improperly plugged abandoned well*” (emphasis in original). The agency found more than a dozen confirmed or suspected cases in which pollutants had migrated up abandoned wells and contaminated groundwater. In one case, drilling wastewater migrated up an abandoned well a half mile away from where the wastewater was injected underground for disposal.<sup>878</sup>
- November 1978 – In a report later cited by the EPA in its 1987 report to Congress (cited above), the state of Illinois Environmental Protection Agency found that oil and natural gas wastes injected underground could migrate through abandoned oil and natural gas wells and contaminate groundwater. The agency wrote, “In old production areas, abandoned wells may pose a serious threat to ground water quality. Unplugged or improperly plugged wells provide possible vertical communication between saline and fresh water aquifers.”<sup>879</sup>

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<sup>877</sup> U.S. Environmental Protection Agency. (1987). *Report to Congress: Management of wastes from the exploration, development, and production of crude oil, natural gas, and geothermal energy* (III-47, Rep.). Retrieved from <http://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=20012D4P.pdf>

<sup>878</sup> Texas Department of Agriculture, Department of Natural Resources. (1985). *Agricultural land and water contamination: From injection wells, disposal pits, and abandoned wells used in oil and gas production* (pp. 5, 12-15). Austin, TX: Dept. of Agriculture, Office of Natural Resources.

<sup>879</sup> Illinois Environmental Protection Agency, Water Quality Management Planning. (1978). *Illinois oil field brine disposal assessment* (pp. 44-45, Rep.).



## Flood risks

*Fracking exacerbates flood risks in two ways. First, massive land clearing and forest fragmentation that necessarily accompany well site preparation increase erosion, run-off, and risks for catastrophic flooding. The construction of access roads, easements for pipelines, and build-out of other related infrastructure further contribute to the problem. Compared to an acre of forest or meadow, an acre of land subject to fracking construction activity releases 1,000-2,000 times more sediment during rainstorms. In addition, in some cases, operators choose to site well pads on flood-prone areas in order to have easy access to water for fracking, to abide by setback requirements intended to keep well pads away from inhabited buildings, or to avoid productive agricultural areas.*

*Second, the vulnerability of fracking sites to flooding increases the known dangers of unconventional gas extraction, heightening the risks of contamination of soils and water supplies, the overflow or breaching of containment ponds, and the escape of chemicals and hazardous materials. During Hurricane Harvey flooding in Texas in 2017, Eagle Ford operators reported 31 spills at oil and gas wells, storage tanks, and pipelines. Rising sea levels, more powerful hurricanes, and increased storm surges in coastal areas, a consequence of climate change, are expected to represent an increasing threat to oil and gas infrastructure, especially along the Gulf coast. According to a 2018 study, natural gas processing plants in U.S. coastal areas are among the most vulnerable energy infrastructure to inundation by sea level rise.*

- March 5, 2019 – In the aftermath of Hurricane Harvey, which brought record rainfall and widespread flooding to Houston and Galveston, the state of Texas and the U.S. Environmental Protection Agency (EPA) prohibited a National Aeronautics and Space Administration (NASA) plane “equipped with the world’s most sophisticated air samplers” to fly over chemical spills, fires, flooded storage tanks, damaged plants, and flooded Superfund sites. Instead, a single-prop plane was used by the EPA to gather information on about two dozen air pollutants, whereas the NASA jet could have analyzed more than 450. At the same time, the Texas governor began a seven-month suspension of state air pollution emissions rules. A subsequent investigation by the Associated Press and the *Houston Chronicle* showed there was “widespread, unreported pollution and environmental damage in the region. The team identified more than 100 storm-related toxic releases, including a cloud of hydrochloric acid that leaked from a damaged pipeline and a gasoline spill from an oil terminal that formed ‘a vapor cloud.’”<sup>880</sup>
- November 30, 2018 – According to the *Miami Herald*, a new Florida Power & Light gas plant, replacing an existing one, will be raised 11.5 feet “to protect from sea level rise, a growing threat caused by emissions from fossil fuel plants.” The region is expected to see 14 to 34 inches of sea level rise by 2062. Testimony at a public hearing, following an

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<sup>880</sup> Rust, S., & Sahagun, L. (2018, March 5). Post-Hurricane Harvey, NASA tried to fly a pollution-spotting plane over Houston. The EPA said no. *Los Angeles Times*. Retrieved from <https://www.latimes.com/local/california/la-me-nasa-jet-epa-hurricane-harvey-20190305-story.html>

outpouring of public opposition to the project, included objections to further investments in fossil fuel projects. “What will you tell residents when the last of their personal possessions wash out to sea and the plant that fuels that tide stands above them?”<sup>881</sup>

- November 29, 2018 – Storm protections will not be coming nearly as quickly as the planned tens of billions of dollars in new natural gas processing and chemical facilities along the Texas gulf, explained a collaborative investigative article in the *Texas Tribune*. “Many of the proposed, under-construction or recently built facilities along the Texas Gulf are in areas that felt [Hurricane] Harvey’s bite.” Harvey dropped more rain than any storm on U.S. record and led to chemical spills, contaminant releases to the air, and explosions at oil, gas, and chemical facilities. “Extensive storm modeling by top Texas scientists has shown that if a hurricane hit near the southern end of Galveston Island outside Houston... storm surge would pour into the Port of Houston, dislodging thousands of storage tanks full of crude oil and hazardous chemicals.”<sup>882</sup>
- September 14, 2018 – In Beaver County, Pennsylvania, a landslide following heavy rains and flooding caused an explosion of a new section of Energy Transfer Partners’ Revolution Pipeline one week after it was operational, according to an investigative piece in *Environmental Health News*. The explosion destroyed a house, other structures, and vehicles, and forced evacuations. A few months earlier, a TransCanada natural gas pipeline in Marshall County, West Virginia exploded due to landslide. In its recent permit application, Shell Pipeline Company identified 25 locations prone to landslides along the route of its proposed Falcon Ethane Pipeline through Pennsylvania, Ohio, and West Virginia.<sup>883</sup>
- September 11, 2018 – Pipeline construction guidelines are based on standards that do not account for recent changes in weather patterns, and flood risks are particularly exacerbated along the Mountain Valley Pipeline route, which passes through extraordinarily rugged terrain. In a mountainous area of Virginia, pipeline construction workers were compelled to rush preparations for catastrophic rain from Hurricane Florence in summer 2018 as the abnormally wet summer overcame efforts to prevent runoff and erosion.<sup>884</sup>

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<sup>881</sup> Harris, A., & Gross, S. J. (2018, November 30). FPL to build new fossil fuel plant — and elevate it 11 feet to protect from sea rise. *Miami Herald*. Retrieved from <https://www.miamiherald.com/news/local/community/broward/article222435610.html?fbclid=IwAR3mbqV7WBYvpGOzmLpbz1R6q1gxZQJzwXQ84fmx0RBocfyAG93M6bsZGws>

<sup>882</sup> Hopkins, J. S., & Collier, K. (2018, November 29). Surge of oil and gas flowing to Texas coastline triggers building boom, tensions. *Texas Tribune*. Retrieved from <https://www.texastribune.org/2018/11/29/oil-and-gas-surge-texas-coastline-triggers-building-boom-tensions/>

<sup>883</sup> Marusic, K. (2018, September 14). 25 zones along the proposed Shell Falcon Pipeline are at risk of explosions due to landslides. *Environmental Health News*. Retrieved from <https://www.ehn.org/here-are-the-25-zones-along-the-proposed-shell-falcon-pipeline-at-risk-of-explosions-due-to-landslides-2604629860.html>

<sup>884</sup> Schneider, G. S. (2018, September 11). Hurricane could devastate Virginia pipeline project that is already struggling with changing weather. *Washington Post*. Retrieved from [https://www.washingtonpost.com/local/virginia-politics/hurricane-could-devastate-virginia-pipeline-project-that-is-already-struggling-with-changing-weather/2018/09/11/572d0ef8-b5cf-11e8-94eb-3bd52dfe917b\\_story.html?noredirect=on&utm\\_term=.194bc781a7df&wpisrc=nl\\_buzz&wpm=1](https://www.washingtonpost.com/local/virginia-politics/hurricane-could-devastate-virginia-pipeline-project-that-is-already-struggling-with-changing-weather/2018/09/11/572d0ef8-b5cf-11e8-94eb-3bd52dfe917b_story.html?noredirect=on&utm_term=.194bc781a7df&wpisrc=nl_buzz&wpm=1)

- August 22, 2018 –The state of Texas sought at least \$12 billion, nearly all of it coming from public funds, to build a nearly 60-mile “spine” of concrete seawalls, earthen barriers, floating gates, and steel levees on the Texas Gulf Coast. This region is home to one of the world’s largest concentrations of petrochemical facilities, including most of Texas’ 30 refineries. Facilities that would be protected by this project include those owned by the Saudi-controlled Motiva, Chevron, DuPont, and others. Scaled back from earlier proposals, the current one focused on refineries, according to the Associated Press.<sup>885</sup>
- April 28, 2018 – In their assessment of coastal energy infrastructure at risk along the Gulf Coast, scholars at Louisiana State University concluded that natural gas processing plants in the United States are particularly vulnerable to inundation by sea level rise compared to other energy infrastructure, with up to eight percent of natural gas processing capacity at risk. Tidal flooding is known to be an ancillary effect of sea level rise. Hence, apart from sea level rise itself, “storm surges and flooding from extreme weather-related events often increase the current exposure of these facilities to near-term damage.”<sup>886</sup> Fifteen natural gas processing plants were in the potential inundation zones of the study’s various sea level rise scenarios, with nine plants projected to be inundated under all three scenarios.
- December 29, 2017 – Flooding was a central theme in an internationally focused review of energy critical infrastructures at risk from climate change. Potential flood impacts on oil and gas infrastructure take many forms: storm surge flooding damaging aboveground fuel storage tanks; flood-related soil erosion exposing buried underground oil and gas pipelines; and inundation of oil refineries. The authors noted that as climate change “leads to an increase in atmospheric moisture content, the likelihood of extreme precipitation and the risk of flooding increase with associated physical impacts” on infrastructure such as power plants and gas pipelines.<sup>887</sup>
- September 15, 2017 – Hurricane Harvey and its resulting flooding affected various parts of metropolitan Houston’s vast oil and gas operations, as well as the Eagle Ford shale region of South Texas. *Reuters* reviewed company reports to the U.S. Coast Guard on the various releases of petrochemicals around the time of Harvey’s hit and subsequent flooding. In addition to more than 22,000 barrels of crude oil, gasoline, diesel, drilling wastewater, and petrochemicals spilled from refineries, storage terminals, and other facilities in the days after the storm, 27 million cubic feet (765,000 cubic meters) of natural gas was released.<sup>888</sup> Pipeline operators are required to report oil and gas, but not

<sup>885</sup> Weissert, W. (2018, August 22). Big oil asks government to protect it from climate change. *Associated Press*. Retrieved from <https://apnews.com/4adc5a2a2e6b45df953ebc6b63d171>

<sup>886</sup> Dismukes, D.E., & Narra, S. (2018) Sea-level rise and coastal inundation: A case study of the Gulf Coast energy infrastructure. *Natural Resources*, 9, 150-174. doi: 10.4236/nr.2018.94010

<sup>887</sup> Mikellidou, C. V., Shakou, L. M., Boustras, G., & Dimopoulos, C. (2018). Energy critical infrastructures at risk from climate change: A state of the art review. *Safety Science*, 110, 110-120. Advance online publication. doi: 10.1016/j.ssci.2017.12.022

<sup>888</sup> Flitter, E., & Valdmanis, R. (2017, September 15). Oil and chemical spills from Hurricane Harvey big, but dwarfed by Katrina. *Reuters.com*. Retrieved from <https://www.reuters.com/article/us-storm-harvey-spills/oil-and-chemical-spills-from-hurricane-harvey-big-but-dwarfed-by-katrina-idUSKCN1BQ1E8>

drilling wastewater, spills to the Texas Railroad Commission. An environmental organization retrieved and listed this data, finding 31 spills at oil and gas wells, storage tanks, and pipelines during the hurricane's flooding. The group notes that though the data contains many "produced water" spills, they are likely underreported since they are not mandatory.<sup>889</sup> More than half the fracking rigs running in the region were estimated to have shut down. "Given that much of oil and gas activity occurs in areas only accessible via dirt roads, the heavy rainfall usually makes the movement of trucks and supplies much more difficult...The trucking and rail of sand, chemicals, and personnel to the well site will all take more time given the likely nasty condition of many Eagle Ford access roads," according to an energy analyst.<sup>890</sup>

- May 25, 2016 – The removal of photos of flood-related oil spills on a Texas state-run website appears to be an effort to hide visuals that "don't portray the energy business in a flattering light," according to the *El Paso Times* Editorial Board. The photos revealed potential environmental damage caused by flooding at fracking sites.<sup>891</sup> As earlier reported by the *El Paso Times*, many of the photos shot during Texas' recent floods "show swamped wastewater ponds at fracking sites, presumably allowing wastewater to escape into the environment—and potentially into drinking-water supplies."<sup>892</sup>
- May 1, 2016 – Spring floods across Texas inundated oil wells and fracking sites, tipped over storage tanks, and flushed crude oil and fracking chemicals into rivers, as documented in an Associated Press story that referenced dozens of aerial photographs showing flooded production sites along the Sabine River on the Texas-Louisiana border. (The photographs were later removed from direct public access; see above.) Past president of the American Public Health Association Walter Tsou, MD, called the situation "a potential disaster."<sup>893</sup>
- June 12, 2015 – At the beginning of 2015, after a month of record-breaking rainfall, Fish and Wildlife Service officials at the Hagerman National Wildlife Refuge in Texas found that floodwaters flowing through oil production well pads in the refuge had inundated dozens of jackpumps, pipelines, and other oil and gas infrastructure, leaving bubbling, oily water and a gassy stench. In 1989, the U.S. Government Accountability Office (GAO) called for "bold action" to address fossil fuel production activities incompatible

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<sup>889</sup> Environment Texas. (2017, September 12). *Report: Environmental and health concerns about oil and gas spills after Hurricane Harvey*. Retrieved from <https://environmenttexas.org/sites/environment/files/reports/Harvey%20Oil%20Gas%20Spills%20-%20Env%20TX%20-%209.22.17.pdf>

<sup>890</sup> Wethe, D. (2017, August 31). Harvey's floods could delay 10% of U.S. fracking: Analyst. *Bloomberg L.P.* Retrieved from <https://www.bloomberg.com/news/articles/2017-08-31/harvey-s-floods-could-delay-10-percent-of-u-s-fracking-analyst>

<sup>891</sup> *El Paso Times* Editorial Board. (2016, May 25). Editorial: Hiding bad news from Texans. *El Paso Times*. Retrieved from <http://www.elpasotimes.com/story/opinion/editorials/2016/05/25/editorial-hiding-bad-news-texans/84937054/>

<sup>892</sup> Schladen, M. (2016, April 30). Flooding sweeps oil, chemicals into rivers. *El Paso Times*. Retrieved from <http://www.elpasotimes.com/story/news/2016/04/30/flooding-sweeps-oil-chemicals-into-rivers/83671348/>

<sup>893</sup> Siron, C. (2016, May 1). Texas floods washing fracking chemicals, crude oil into rivers. *Dallas Morning News*. Retrieved from <http://thescoopblog.dallasnews.com/2016/05/texas-floods-washing-fracking-chemicals-crude-oil-into-rivers.html/>

with the mission of the refuge system. Subsequent reforms have been exceedingly slow, according to a report from *Greenwire*. In most cases, the Fish and Wildlife Service does not know how much fossil fuel is produced or spilled on refuges, and remediation efforts are inadequate. Severe weather events are expected to increase in frequency and severity as climate change progresses, amplifying flood related concerns.<sup>894</sup>

- June 20, 2014 – The *Coloradoan* reported that Noble Energy storage tanks damaged by spring flooding in Colorado dumped 7,500 gallons of crude oil, fracking chemicals, and fracking wastewater into the Cache la Poudre River, which is both a National Heritage area and a habitat for Colorado's only self-sustaining population of wild trout. Recent high river flows had undercut the bank where the oil tank was located, which caused the tank to drop and break a valve.<sup>895</sup>
- March 2014 – An extraordinary flood that struck the Front Range of Colorado killed ten people, forced the evacuation of 18,000 more, destroyed more than 1,850 homes, and damaged roads, bridges, and farmland throughout the state. More than 2,650 oil and gas wells and associated facilities were also affected, with 1,614 wells lying directly within the flood impact zone. Many of these storm-damaged facilities and storage tanks leaked uncontrollably. In a later accounting, Matt Lepore, Director of the Colorado Oil and Gas Conservation Commission, estimated the flooding had resulted in the release to the environment of 48,250 gallons of oil or condensate and 43,479 gallons of fracking wastewater from 50 different spill sites across the state. In Colorado, more than 20,850 oil and gas wells lie within 500 feet of a river, stream, or other drainage. According to Director Lepore, setback requirements that keep drilling and fracking operations away from residential areas inadvertently encourage operators to drill in unoccupied floodplains. At the same time, oil and gas operators prefer locations close to supplies of water for use in fracking. These twin factors result in a clustering of drilling and fracking operations in low-lying areas prone to catastrophic flooding.<sup>896</sup>
- 2004-2013 – In at least six of the last ten years (2004, 2005, 2006, 2009, 2011, and 2013), several counties targeted for shale gas drilling in New York State have experienced serious flooding. These include the counties of Albany, Broome, Cattaraugus, Chautauqua, Chenango, Delaware, Erie, Greene, Madison, Orange, Otsego, Schoharie, Sullivan and Ulster. In at least five of the past 10 years (2004, 2005, 2006, 2009 and 2011), floods have exceeded 100-year levels in at least some of the counties.<sup>897, 898, 899, 900, 901, 902, 903</sup>

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<sup>894</sup> Hiar, C. (2015, June 12). Wildlife refuges: Floods expose weakness in FWS's oil and gas oversight. *E&E Publishing*. Retrieved from <http://www.eenews.net/stories/1060020169>

<sup>895</sup> Handy, R. (2014, June 20). Crude oil spills into Poudre near Windsor. *Coloradoan*. Retrieved from <http://www.coloradoan.com/story/news/local/2014/06/20/crude-oil-spills-poudre-near-windsor/11161379/>

<sup>896</sup> Lepore, M. (2014, March). "Lessons Learned" in the front range flood of September 2013: a staff report to the commissioners of the Colorado Oil and Gas Conservation Commission. Retrieved from [http://cogcc.state.co.us/Announcements/Hot\\_Topics/Flood2013/FinalStaffReportLessonsLearned20140314.pdf](http://cogcc.state.co.us/Announcements/Hot_Topics/Flood2013/FinalStaffReportLessonsLearned20140314.pdf)

<sup>897</sup> Brooks, L. T. (2005). *Flood of September 18-19, 2004 in the upper Delaware River basin, New York* (Rep.). United States Geological Survey. Retrieved from <http://ny.water.usgs.gov/pubs/of/of051166/>

<sup>898</sup> Suro, T. P., & Firda, G. D. (2006). *Flood of April 2-3, 2005, Neversink River basin, New York* (Rep.). United States Geological Survey. Retrieved from <http://pubs.usgs.gov/of/2006/1319/>

- February 7, 2013 – In its 2012 annual report to investors, oil and gas drilling company Noble Energy stated, “Our operations are subject to hazards and risks inherent in the drilling, production and transportation of crude oil and natural gas, including ... flooding which could affect our operations in low-lying areas such as the Marcellus Shale.”<sup>904</sup>
- September 7, 2011 – The New York State Department of Environmental Conservation’s (NYS DEC) draft shale gas drilling plan recommended that drilling be prohibited within 100-year floodplains but acknowledged that many areas in the Delaware and Susquehanna River basins that were affected by flooding in 2004 and 2006 were located outside of officially designated flood zones.<sup>905</sup> In 2004, 2005, 2006, 2009, and 2011, flooding in New York exceeded 100-year levels in at least some of the counties where drilling and fracking may occur.
- 1992 – In its Generic Environmental Impact Statement (GEIS) for oil and natural gas drilling, which was predicated on conventional drilling, the NYS DEC raised concerns that storage tanks holding drilling wastewater, spent hydraulic fracturing fluid, or other contaminants could be damaged by flooding and leak. At the time, the GEIS called for at least some of these tanks to be properly secured.<sup>906</sup> Shale gas extraction via horizontal fracking would require many more storage tanks for fracking fluids and wastewater than conventional drilling operations anticipated in 1992 when the agency estimated that oil and gas wells in the state would each require 20,000-80,000 gallons of fracking fluid.<sup>907</sup> As of 2011, the agency anticipated that high volume, horizontally fracked shale gas wells

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<sup>899</sup> Suro, T. P., Firda, G. D., & Szabo, C. O. (2009). *Flood of June 26–29, 2006, Mohawk, Delaware and Susquehanna River basins, New York* (Rep.). United States Geological Survey. Retrieved from <http://pubs.usgs.gov/of/2009/1063/pdf/ofr2009-1063.pdf>

<sup>900</sup> Szabo, C. O., Coon, W. F., & Niziol, T. A. (2010). *Flash floods of August 10, 2009, in the villages of Gowanda and Silver Creek, New York* (Rep.). United States Geological Survey. Retrieved from <http://pubs.usgs.gov/sir/2010/5259/pdf/SIR%202010-5259.pdf>

<sup>901</sup> Szabo, L. (2011, September 8). *Remnants of Tropical Storm Lee cause record flooding in the Susquehanna River basin* (Rep.). United States Geological Survey. Retrieved from <http://ny.water.usgs.gov/leeindex.html>

<sup>902</sup> Giordano, S. (2013, January 29). Several eastern counties in central New York under water after heavy flooding. *Syracuse Post-Standard*. Retrieved from [http://www.syracuse.com/news/index.ssf/2013/06/several\\_eastern\\_counties\\_in\\_ce.html](http://www.syracuse.com/news/index.ssf/2013/06/several_eastern_counties_in_ce.html)

<sup>903</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (2-32, 33, Rep.).

<sup>904</sup> Noble Energy, Annual Report (Form 10-K) (Feb. 7, 2013) at 42.

<sup>905</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (ES-22, 2-32, 33, Rep.).

<sup>906</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (8-42, 8-43, 9-35, Rep.).

<sup>907</sup> New York State Department of Environmental Conservation. (1992). *Generic environmental impact statement on the oil, gas and solution mining regulatory program* (Rep.). (9-26, Rep.). Retrieved from [http://www.dec.ny.gov/docs/materials\\_minerals\\_pdf/dgeisv1ch8.pdf](http://www.dec.ny.gov/docs/materials_minerals_pdf/dgeisv1ch8.pdf)

in New York State would each require 2.4-7.8 million gallons of fluid—roughly 100 times the 1992 estimate.<sup>908</sup>

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<sup>908</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (ES-8, Rep.).

## Threats to agriculture, soil quality, and forests

*Drilling and fracking operations pose risks to farming, soil, and forests. In California, fracking wastewater illegally injected into aquifers threatens crucial irrigation supplies to farmers in a time of severe drought. Fracking wastewater reused for irrigation and livestock watering in California's San Joaquin Valley may contain at least ten known or suspected chemical carcinogens, as well as over a dozen chemicals with no available toxicological data and many unidentified compounds currently classified as "trade secrets." Agricultural uses of wastewater, as well as flowback water spills, raise questions about direct exposure of affected soils, contamination of food crops via bioabsorption through plant roots, and impacts on livestock due to ingestion. Studies and case reports from across the country have highlighted instances of deaths, neurological disorders, aborted pregnancies, and stillbirths in farm animals that have come into contact with wastewater. Additionally, farmers have expressed concern that nearby fracking operations can hurt the perception of agricultural quality and invalidate value-added organic certification. Land use changes and transport of invasive species by drilling and fracking operations have led to documented ecological and monetary harm to soils, forests, and natural areas. In forested areas of Pennsylvania, drilling and fracking operations have greatly reduced canopy covers and thereby diminished the carbon storage capacity of photosynthesizing forest trees. Soil compaction in cleared areas is detrimental to new plant growth and encourages the growth of invasive species.*

- September 15, 2018 – Drilling and fracking operations and their associated infrastructure removed a large volume forest canopy in the upper Susquehanna River basin of New York and Pennsylvania from 2006 to 2013. This loss can be considered permanent, according to U.S. Geological Survey (USGS) scientists. Using “lidar” (light detection and ranging) remote sensing technology, the research team assessed three-dimensional volumetric change of forest loss, as opposed to two-dimensional areal loss. Because trees capture carbon dioxide on the surfaces of their canopy leaves during photosynthesis, three-dimensional measurements allow for the assessment of the carbon storage capacity that is sacrificed to gas development via tree removal. The researchers found that a total of 991,326,760m<sup>3</sup> of forest canopy was removed by oil and gas activities in the upper Susquehanna River watershed area studied. New York's loss was “relatively low” because of the state's fracking moratorium during the study period. The largest losses in forest volumes took place in the Pennsylvania counties of Lycoming, Tioga, Sullivan, Bradford, Wyoming, and Susquehanna. Although timber operations removed more canopy overall, that loss was concentrated in a smaller area.<sup>909</sup>
- September 7, 2018 – Cleared areas around fracking well pads in Pennsylvania state forests are subjected to soil compaction equivalent to that in parking lot construction, according to researchers quoted in a *StateImpact* article. Although not used once the well is in production, these cleared areas are not typically repaired or replanted. Further, this

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<sup>909</sup> Young, J., Maloney, K. O., Slonecker, E. T., & Milheim, L. E., & Siripoonsup, D. (2018). Canopy volume removal from oil and gas development activity in the upper Susquehanna River basin in Pennsylvania and New York (USA): An assessment using lidar data. *Journal of Environmental Management*, 222, 66-75. doi: 10.1016/j.jenvman.2018.05.041



level of compaction is detrimental to new plant growth as the soil has fewer pores to store water or gases needed for plant survival. Experimenting with repair for these areas, Penn State University soil scientist Patrick Drohan said, “A lot of our native species, especially the grasses, are very deeply rooted. So if they can get down through 20 inches of loosened soil they’re going to be able to develop really deep, nice root systems.” Though involved with these experiments and resulting step-by-step repair directions, the Pennsylvania Department of Conservation and Natural Resources is “not proposing to make any of these methods mandatory.”<sup>910</sup>

- July 18, 2018 – A USGS study on the Colorado Plateau investigated vegetation cover at inactive well sites. Researchers found that on half of plugged and abandoned oil and gas well sites, the median vegetation cover after five years was 26 percent, while sites with high vegetation cover were dominated by invasive, non-native species. Using satellite-based Landsat time series analysis, the scientists looked at three to six years of vegetation regrowth at 365 well sites in Utah, Colorado, and New Mexico, drilled in 1985 or after and abandoned in 1997 or after. Vegetation recovery generally slowed over time and was related to moisture conditions year to year. Recovery was lower on abandoned well sites in shrublands or evergreen woodlands, which produced only about half the regrowth of well sites in grasslands. The grassland recovery, however, was dominated by invasive annuals such as cheatgrass and Russian thistle. There are currently over 26,000 abandoned and 63,000 active well pads on the Colorado Plateau.<sup>911</sup>
- July 17, 2018 – A simulation study that applied actual fracking wastewater to local soils in the Denver area investigated how fracking spills might affect the growth of crops. Spills of fracking wastewater resulted in metal contamination at environmentally relevant concentrations as well as a dramatic decrease in water infiltration rate in ways that could have “severe impact on crop production.”<sup>912</sup> Many of the metals studied, including copper, lead, and iron, “met or approached water quality standards and could have important environmental and human health impacts.”
- April 13, 2018 – Grasslands and row crop habitats were most affected in a predictive modeling study of vegetation conversion and landscape fragmentation that would result from future drilling and associated well pad construction in the Eagle Ford Shale. The study, which used “energy production outlook” predictions, found that these impacts increased in spatial extent and magnitude as oil prices increased. The study anticipated that up to 83,000 wells would be drilled through the year 2045 and include as many as 45,500 well pads. In this scenario, between 26,485 and 70,623 hectares (65,446 to 174,513 acres) would undergo vegetative conversion. These results are consistent with findings from related studies. The authors cautioned that their model did not include

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<sup>910</sup> Frazier, R. (2018, September 7). Bringing the forest back after shale gas. *StateImpact*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2018/09/07/bringing-the-forest-back-after-shale-gas/>

<sup>911</sup> Waller, E. K., Villarreal, M. L., Poitras, T. B., Nauman, T. W., & Duniway, M. C. (2018). Landsat time series analysis of fractional plant cover changes on abandoned energy development sites. *International Journal of Applied Earth Observation and Geoinformation*, 73, 407-419. doi: 10.1016/j.jag.2018.07.008

<sup>912</sup> Oetjen, K., Blotvogel, J., Borch, T., Ranville, J. F., & Higgins, C. P. (2018). Simulation of a hydraulic fracturing wastewater surface spill on agricultural soil. *Science of the Total Environment*, 645, 229-234. doi: 10.1016/j.scitotenv.2018.07.043

future locations of associated infrastructure, such as surface water impoundments and compressor stations. If they were included, “doubling land-change results of this study... would result in a reasonable estimate of overall footprint of all hydrocarbon extractive infrastructure.”<sup>913</sup>

- July 20, 2017 – Penn State University researchers identified a direct correlation between the spread of invasive, non-native plants in Pennsylvania's northern forests and specific aspects of fracking operations. Researchers surveyed 127 Marcellus Shale gas well pads and adjacent access roads in seven state forest districts in the Allegheny National Forest. The study “found that within less than a decade invasive non-native plants have spread to over half of the 127 well pads in our survey, and for the 85% of the pads that were less than 4 years old it occurred in a much shorter period of time.” Gravel shipments and mud on the tires and undercarriages of trucks carry and deposit seeds and propagules of invasive plants. “Given the fact that on average 1235 one-way truck trips delivering fracturing fluid and proppant are required to complete an unconventional well, the potential to transport invasive plant propagules is significant.”<sup>914</sup> “The spread of invasive non-native plants could have long-term negative consequences for the forest ecosystem in a region where the ubiquitous woods provide timbering revenue, wildlife habitat, and ecotourism, warns team member David Mortensen, professor of weed and applied plant ecology.”<sup>915</sup>
- May 15, 2017 – By 2015, the annual ecological cost of fracking in the United States reached over \$272 million per year, according to a team of biologists from Hendrix College in Arkansas. They reached this value by estimating the impact of land-use changes on “ecosystem services,” the benefits that natural habitats provide to humans, such as carbon sequestration, flood mitigation, food security, ecotourism revenue, and genetic diversity. Authors considered this estimate to be conservative. In addition, they wrote, “[d]epending on future well-drilling rates, cumulative ecosystem services costs projected to the year 2040 range from US\$9.4 billion to US\$31.9 billion.” Their results showed, “that temperate grassland and deciduous forest are being disproportionately impacted by unconventional oil and gas development. Temperate grasslands are some of the most imperiled ecosystems in North America.” They found “considerable variation in ecosystem services costs between different plays, with Haynesville, Bakken/Three Forks, and Fayetteville showing the highest annual costs.”<sup>916</sup>

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<sup>913</sup> Wolaver, B. D., Pierre, J. P., Ikonnikova, S. A., Andrews, J. R., McDaid, G., Ryberg, W. A., . . . LaDuc, T. J. (2018). An improved approach for forecasting ecological impacts from future drilling in unconventional shale oil and gas plays. *Environmental Management*, 62(2), 323-333. doi: 10.1007/s00267-018-1042-5

<sup>914</sup> Barlow, K. M., Mortensen, D. A., Drohan, P. J., & Averill, K. M. (2017). Unconventional gas development facilitates plant invasions. *Journal of Environmental Management*, 202, 208e216. doi: 10.1016/j.jenvman.2017.07.005

<sup>915</sup> Mulhollem, J. (2017, July 20). Shale gas development spurring spread of invasive plants in Pa. forests. *PennState News*. Retrieved from <http://news.psu.edu/story/475225/2017/07/20/research/shale-gas-development-spurring-spread-invasive-plants-pa-forests>

<sup>916</sup> Moran, M. D., Taylor, N. T., Mullins, T. F., Sardar, S. S., & McClung, M. R. (2017). Land-use and ecosystem services costs of unconventional US oil and gas development. *Frontiers in Ecology and the Environment*, 15(5), 237–242. doi: 10.1002/fee.1492

- April 2, 2017 – Nearly four percent of “core forest” was lost within six years of shale gas development in Lycoming County, Pennsylvania, from 2010 to 2016. Pipelines were the largest contributor to the industry’s spatial footprint and were identified as the major fragmenting feature. “Linear infrastructure” (pipelines and roads) led to 3.2 percent loss of core forest, whereas well pad infrastructure (well pad, water impoundment, compressor station, etc.) resulted in 0.9 percent loss of core forests. “Limiting loss of core forest and fragmentation is of particular importance in Pennsylvania and central Appalachia due to potential impacts to area sensitive species.”<sup>917</sup>
- November 29, 2016 – A study by engineers and environmental scientists from China, the U.K., and the Republic of Korea investigated the impact of contaminated fracking flowback water on soil health, using soils from representative shale gas areas in China. They also performed a preliminary human health risk assessment of exposure to the arsenic found in such soils. The solutions they tested were representative of flowback water from various stages following a fracked well’s establishment, and their study found that the temporal change in the composition of these wastewaters “leads to different environmental implications.” They tested heavy metal mobility and bioaccessibility, finding that even though mobility was reduced by high ionic strength of flowback water, the metals maintained relatively high bioaccessibility. Soil toxicity moderately increased after a month “aging” with the flowback water treatment. Arsenic, one of the metals included in the testing, is a known human carcinogen and therefore the focus of the human health risk assessment. Results indicated “a low level of cancer risk through exposure via ingestion.”<sup>918</sup>
- October 4, 2016 – A research team from Lawrence Berkeley National Laboratory, University of California Berkeley, and University of the Pacific released preliminary results from a first-ever hazard assessment of chemicals used in California oil drilling operations that reuse wastewater for livestock watering and other agricultural purposes in the San Joaquin Valley. This evaluation, compiled as a technical report by PSE Healthy Energy and Lawrence Berkeley National Laboratory, revealed that more than one-third of the 173 chemicals used are classified as trade secret and their identities are therefore unknown. Of the remainder, ten are classified as either carcinogenic or possibly carcinogenic in humans, 22 are classified by the state of California as toxic air contaminants, and 14 had no ecotoxicity or mammalian toxicity data available. “It is difficult or impossible to estimate risks to consumers, farmworkers or the environment,” the authors concluded, “when identification of chemical additives remains in trade secret form and/or lacks toxicity and environmental profile information.”<sup>919</sup>

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<sup>917</sup> Langlois, L. A., Drohan, P. J., & Brittingham, M. C. (2017). Linear infrastructure drives habitat conversion and forest fragmentation associated with Marcellus shale gas development in a forested landscape. *Journal of Environmental Management*, 197, 167-176. Retrieved from

<https://www.sciencedirect.com/science/article/pii/S0301479717302608?via%3Dihub>

<sup>918</sup> Chen, S. S., Suna Y., Tsang, D. C. W., Grahame, N. J. D., Ok, Y. S., Feng, Y., & Li, X.-D. (2016). Potential impact of flowback water from hydraulic fracturing on agricultural soil quality: Metal/metalloid bioaccessibility, Microtox bioassay, and enzyme activities. *Science of the Total Environment*, 579, 1419–1426. doi: 10.1016/j.scitotenv.2016.11.141

<sup>919</sup> Shonkoff, S. B. C., Stringfellow, W. T., & Domen, J. K. (2016, September). *Hazard assessment of chemicals additives used in oil field that reuse produced water for agricultural irrigation, livestock watering, and groundwater*

- June 1, 2016 – “Co-contaminant interaction effects” can occur when multiple chemicals are involved in spills of oil and gas wastewater on agricultural soils, according to a study by a Colorado State University research team. Through simulations, researchers analyzed how degradation was affected when combinations of three fracking-related organic chemicals spilled, alone or together: polyethylene glycol, a commonly used surfactant; glutaraldehyde, a biocide to prevent pipe corrosion from microbial activity; and polyacrylamide, a friction reducer. In addition to interactions between the chemicals, they analyzed the role of naturally occurring salts. Results showed that polyethylene glycol surfactants alone can break down in topsoil within 42–71 days, but, in the presence of the biocide glutaraldehyde or salt concentrations typical of fracking wastewater, their biodegradation was impeded or halted altogether. Authors emphasized that the interactions they studied account for only a fraction of the hundreds of fracking chemicals in use, but that their results “show a complex picture of co-contaminant fate and toxicity” that has, so far, been ignored in the regulatory process.<sup>920</sup>
- December 12, 2015 – A research team at the University of Aberdeen found high levels of selenium, molybdenum, and arsenic in rock samples collected from a region in northern England that has been targeted for fracking. The finding is important due to the possible risk that these toxic elements will be released into groundwater during shale gas operations. Selenium poisoning has occurred among Irish horses confined to pastures underlain by black shale. While small amounts of selenium are essential for metabolism, high levels (which, in the case of human consumption, is above 400 µg/day) are toxic. Possible consequences include neurotoxicity, cancer and diabetes.”<sup>921</sup>
- November 23, 2015 – Gas-related impacts on Pennsylvania farmers may include pipelines criss-crossing fields and forests, as well as jeopardization of organic certification, according to a report covering a State Agriculture Department spokesman’s presentation, on the Potter County government website. The spokesman said, “steps should be taken to steer this development in ways that diminish impact on soil quality and fragmentation.” “With trees and other vegetation being cleared from pipeline rights-of-way, he noted, it’s important for the acreage to be replanted with plant species that are beneficial to agriculture—pollinating plants, as an example.”<sup>922</sup>
- October 24, 2015 – More than 180 million gallons of wastewater from oil and gas operations spilled from 2009 to 2014, according to an Associated Press analysis of data

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*recharge in the San Joaquin Valley of California: Preliminary results.* Retrieved from [https://www.psehealthyenergy.org/wp-content/uploads/2017/04/Preliminary\\_Results\\_13267\\_Disclosures\\_FINAL-1.pdf](https://www.psehealthyenergy.org/wp-content/uploads/2017/04/Preliminary_Results_13267_Disclosures_FINAL-1.pdf)

<sup>920</sup> McLaughlin, M. C., Borch, T., & Blotvogel, J. (2016). Spills of hydraulic fracturing chemicals on agricultural topsoil: biodegradation, sorption, and co-contaminant interactions. *Environmental Science & Technology*, 50(11). doi: 10.1021/acs.est.6b00240

<sup>921</sup> Parnell, J., Brolly, C., Spinks, S., & Bowden, S. (2015). Selenium enrichment in Carboniferous Shales, Britain and Ireland: Problem or opportunity for shale gas extraction? *Applied Geochemistry*, 66, 82-87. doi: 10.1016/j.apgeochem.2015.12.008

<sup>922</sup> *Potter County Today*. (2015, November 23). Shale gas impact on agriculture ‘profound.’ Retrieved from <http://today.pottercountypa.net/shale-gas-impact-on-agriculture-profound/>

from leading oil- and gas-producing states (Texas, North Dakota, California, Alaska, Colorado, New Mexico, Oklahoma, Wyoming, Kansas, Utah and Montana). A *Dallas Morning News* report focused on how the resulting contamination of groundwater and soils has affected agricultural and ranching. In one case, wastewater from pits seeped beneath a cotton and nut farm near Bakersfield, California and forced the grower to remove 2,000 acres from production. In western Texas, pipeline failures and illegal dumping of frack waste contaminated ranches and pastures.<sup>923</sup>

- May 2, 2015 – The *Los Angeles Times* reported that farmers in Kern County, California purchased over 21 million gallons per day of treated oil field wastewater to use for crop irrigation. The article identified lingering questions about chemicals remaining after treatment and their potential impact both on the crops and those who consume them. Independent testing identified chemicals including acetone and methylene chloride, along with oil, in the treated irrigation water.<sup>924</sup> Acetone and methylene chloride are powerful industrial solvents that are highly toxic to humans, and samples of the wastewater contained concentrations of both that were higher than those seen at oil spill disaster sites. (Chevron’s own report confirmed the presence of acetone, benzene, and xylene, though in lesser concentrations; Chevron did not appear to test for methylene chloride.<sup>925</sup>) Broader testing requirements involving chemicals covered under California’s new fracking disclosure regulations went into effect June 15, 2015.<sup>926</sup>
- April 24, 2015 – Unconventional technologies in gas and oil extraction facilitated the drilling of an average of 50,000 new fractured wells per year in North America over the past 15 years. An interdisciplinary study published in *Science* demonstrated that the accumulating land degradation has resulted in continent-wide impacts, as measured by the reduced amount of carbon absorbed by plants and accumulated as biomass. This is a robust metric of essential ecosystem services, such as food production, biodiversity, and wildlife habitat, and its loss “is likely long-lasting and potentially permanent.” The land area occupied by well pads, roads, and storage facilities built during this period is approximately three million hectares, roughly the land area of three Yellowstone National Parks. The authors concluded that new approaches to land use planning and policy are “necessary to achieve energy policies that minimize ecosystem service losses.”<sup>927</sup>

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<sup>923</sup> Flesher, J. (2015, October 24). Fatal flow: Brine from oil, gas drilling fouls land, kills wildlife at alarming rate. *Dallas Morning News*. Retrieved from <http://www.dallasnews.com/news/local-news/20151024-fatal-flow-brine-from-oil-gas-drilling-fouls-land-kills-wildlife-at-alarming-rate.ece>

<sup>924</sup> Cart, J. (2015, May 2). Central Valley's growing concern: Crops raised with oil field water. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/california/la-me-drought-oil-water-20150503-story.html#page=1>

<sup>925</sup> Amec Foster Wheeler Environment & Infrastructure, Inc. (2015, June 15). Technical report: Reclaimed water impoundments sampling, Cawelo Water District Ponds, Kern River Oil Field, Kern County, California, Prepared for Chevron U.S.A. Inc. Retrieved from <https://drive.google.com/file/d/0B1ccgD60cwq7dWE5Y0c2ZDh5WnM/view>

<sup>926</sup> Ross, D. (2015, June 19). Has our food been contaminated by Chevron's wastewater? *Truthout*. Retrieved from <http://www.truth-out.org/news/item/31470-has-our-food-been-contaminated-by-chevron-s-wastewater>

<sup>927</sup> Allred, B. W., Kolby Smith, W., Tridwell, D., Haggerty, J. H., Running, S. W., Naugle, D. E., & Fuhlendorf, S. D. (2015). Ecosystem services lost to oil and gas in North America. *Science*, 348 (6233), 401-402. doi: 10.1126/science.aaa4785

- January 26, 2015 – Two Colorado scientists performed a detailed analysis of vegetative patterns—followed chronologically—over a selected group of well pads in Colorado managed by the U.S. Bureau of Land Management, including two undisturbed reference sites. They documented the disturbance of plant and soil systems linked to contemporary oil and gas well pad construction, and found that none of the oil and gas well pads included in the study returned to pre-drilling condition, even after 20-50 years. Full restoration may require decades of intensive effort.<sup>928</sup>
- October 14, 2014 – State documents obtained by the Center for Biological Diversity show that almost three billion gallons of fracking wastewater have been illegally dumped into central California aquifers that supply drinking water and farming irrigation. The California Water Board confirmed that several oil companies used at least nine of 11 injection wells that connect with high-quality water sources for disposal of fracking wastewater, which included high levels of arsenic, thallium, and nitrates. The California Division of Oil, Gas and Geothermal Resources has shut down 11 oil field injection wells and is scrutinizing almost 100 others for posing a “danger to life, health, property, and natural resources.” At least one farming company has sued oil producers in part for contaminating groundwater that farms use for irrigation.<sup>929</sup>
- September 6, 2014 – *Al Jazeera America* examined the challenges that North Dakota farmers are facing in light of wastewater spills from oil and gas development. Notably, in heavily drilled Bottineau County, some levels of chloride, from sites where an estimated 16,800-25,200 gallons of wastewater had seeped into the ground, were so high that they exceeded the levels measurable with the North Dakota Department of Health’s test strips. State records, testimonies from oil workers and various residents, and the decades-long failure of contaminated fields to produce crops indicate that wastewater spills are a significant hazard in the current fracking boom.<sup>930</sup>
- August 6, 2014 – The Pennsylvania Department of Environmental Protection (PA DEP) found that leaks of fracking wastewater from three impoundments contaminated soil and groundwater. The findings prompted the state to issue a violation and increase testing.<sup>931</sup>
- August 5, 2014 – Michelle Bamberger, a veterinarian and researcher, and Robert Oswald, a professor of molecular medicine at Cornell University, published a book that describes their research into the impacts of drilling and fracking on agriculture and animal health. They detail results of 24 case studies from six gas drilling states, including follow-up on

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<sup>928</sup> Minnick, T. J., & Alward, R. D. (2015). Plant–soil feedbacks and the partial recovery of soil spatial patterns on abandoned well pads in a sagebrush shrubland. *Ecological Applications*, 25(1), 3-10. doi: 10.1890/13-1698.1

<sup>929</sup> Dechert, S. (2014, October 14). Fracking wastewater spoils California drinking, farm supplies. *Clean Technica*. Retrieved from <http://cleantechnica.com/2014/10/14/fracking-wastewater-spoils-california-drinking-farm-supplies/>

<sup>930</sup> Gottesdiener, L. (2014, September 6). In shadow of oil boom, North Dakota farmers fight contamination. *Al Jazeera America*. Retrieved from <http://america.aljazeera.com/articles/2014/9/6/north-dakota-wastewaterlegacy.html>

<sup>931</sup> Hopey, D. (2014, August 6). State: Fracking waste tainted groundwater, soil at three Washington County sites. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/local/washington/2014/08/06/Pa-finds-tainted-water-soil-at-three-Washington-County-shale-sites/stories/201408050198>

cases they previously published in the peer-reviewed literature, raising concerns about the effects of drilling and fracking on agriculture and the health of animals.<sup>932</sup>

- August 1, 2014 – At least 19,000 gallons of hydrochloric acid spilled during completion of a fracking well on an alfalfa farm in Kingfisher County, Oklahoma. The Oklahoma Corporation Commission reported concerns about rain pushing chemical runoff into a nearby creek that flows into the town of Hennessey’s water system. The responsible company, Blake Production, planned to pay for the alfalfa crop for six years. The landowner and a neighbor were pursuing litigation.<sup>933</sup>
- May 4, 2014 – In an analysis of state data from Colorado, the *Denver Post* reported that fracking related to oil and gas drilling is putting soil quality and farmlands at risk due to significant amounts of toxic fluids penetrating the soil. According to report, 578 spills were reported in 2013, which means that, on average in the state, a gallon of toxic liquid penetrates the ground every eight minutes. Colorado State University soil scientist Eugene Kelly, said that the overall impact of the oil and gas boom “is like a death sentence for soil.”<sup>934</sup>
- November 28, 2012 – In conjunction with the Food & Environment Reporting Network, *The Nation* reported that serious risks to agriculture caused by fracking are increasing across the country and linked these concerns to risks to human health.<sup>935</sup>
- January 2012 – A study of gas drilling’s impacts on human and animal health concluded that the drilling process may lead to health problems. The study reported and analyzed a number of case studies, including dead and sick animals in several states that had been exposed to drilling or hydraulic fracturing fluids, wastewater, or contaminated ground or surface water.<sup>936</sup> The researchers cited 24 cases in six states where animals and their owners were potentially affected by gas drilling. In one case, a farmer separated 96 head of cattle into three areas, one along a creek where fracking wastewater was allegedly dumped and the remainder in fields without access to the contaminated creek; the farmer found that, of the 60 head exposed to the creek, 21 died and 16 failed to produce, whereas the unexposed cattle experienced no unusual health problems. In another case, a farmer reported that of 140 head of cattle exposed to fracking wastewater, about 70 died, and there was a high incidence of stillborn and stunted calves in the remaining cattle.<sup>937</sup>

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<sup>932</sup> Bamberger, M., & Oswald, R. (2014). *The real cost of fracking: How America's shale gas boom is threatening our families, pets, and food*. Boston: Beacon Press.

<sup>933</sup> Passoth, K. (2014, August 1). Major oil field spill in Kingfisher Co. *KOCO.com Oklahoma City*. Retrieved from <http://www.koco.com/news/major-oil-field-spill-in-kingfisher-county/27236612>

<sup>934</sup> Finley, B. (2014, May 4). Colorado faces oil boom “death sentence” for soil, eyes microbe fix. *Denver Post*. Retrieved from [http://www.denverpost.com/environment/ci\\_25692049/colorado-faces-oil-boom-death-sentence-soil-eyes](http://www.denverpost.com/environment/ci_25692049/colorado-faces-oil-boom-death-sentence-soil-eyes)

<sup>935</sup> Royte, E. (2012, November 28). Fracking our food supply. *The Nation*. Retrieved from <http://www.thenation.com/article/171504/fracking-our-food-supply>

<sup>936</sup> Bamberger, M., & Oswald, R. E. (2012). Impacts of gas drilling on human and animal health. *New Solutions: A Journal of Environmental and Occupational Health Policy*, 22(1), 51-77. doi: 10.2190/NS.22.1.e

<sup>937</sup> Ramanujan, K. (2012, March 7). Study suggests hydrofracking is killing farm animals, pets. *Cornell Chronicle*. Retrieved from <http://www.news.cornell.edu/stories/2012/03/reproductive-problems-death-animals-exposed-fracking>

- January 2011 – U.S. Forest Service researchers reported dramatic negative effects on vegetation caused by the drilling and fracking of a natural gas well in an experimental forest in northeastern West Virginia. In June 2008, the researchers found browning of foliage near the well pad, a lack of ground foliage, and that many trees nearby had dropped their foliage. They attributed these impacts to the loss of control of the wellbore on May 29, 2008, which caused an aerial release of materials from the well. Trees showed no apparent symptoms the following summer. However, the researchers also found “dramatic impacts on vegetation” where drilling and fracking wastewater had been sprayed on the land as a disposal technique following completion of the well. Just after the spraying of approximately 60,000 gallons of wastewater at the first disposal site, the Forest Service researchers found 115 damaged trees and other evidence of harm. This figure grew to 147 trees almost a year later. At a second site, where about 20,000 gallons of wastewater was sprayed, the damage was less dramatic, yet the researchers still found “considerable leaf browning and mortality of young northern red oak seedlings.” The researchers concluded that the spraying of the drilling fluids resulted in an “extreme” dose of chlorides to the forest.<sup>938</sup>
- May 2010 – Pennsylvania’s Department of Agriculture quarantined 28 cows in Tioga County after the animals wandered through a spill of drilling wastewater and may have ingested some of it. The Department was concerned that beef eventually produced from the cows could be contaminated as a result of any exposure. In May 2011, only ten yearlings were still quarantined, but the farmer who owned the cows, Carol Johnson, told National Public Radio that of 17 calves born to the quarantined cows in the spring of 2011, only six survived, and many of the calves that were lost were stillborn. “They were born dead or extremely weak. It’s highly unusual,” she said, continuing, “I might lose one or two calves a year, but I don’t lose eight out of eleven.”<sup>939</sup>
- March 2010 – A Pennsylvania State Extension analysis of dairy farms in the state found a decline in the number of dairy cows in areas where fracking was prevalent. Pennsylvania counties that had both more than 10,000 dairy cows and more than 150 Marcellus Shale wells experienced a 16-percent decline in dairy cows between 2007 and 2010.<sup>940</sup>
- April 28, 2009 – Seventeen cows in Caddo Parish, Louisiana died within one hour after apparently ingesting hydraulic fracturing fluids spilled at a well that was being fractured. “It seemed obvious the cattle had died acutely from an ingested toxin that had drained

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<sup>938</sup> Adams, M. B., Edwards, P. J., Ford, W. M., Johnson, J. B., Schuler, T. M., Thomas-Van Gundy, M., & Wood, F. (2011, January). *Effects of development of a natural gas well and associated pipeline on the natural and scientific resources of the Fernow experimental forest*. United States Department of Agriculture, Forest Service. General Technical Report NRS-76. Retrieved from [http://www.fs.fed.us/nrs/pubs/gtr/gtr\\_nrs76.pdf](http://www.fs.fed.us/nrs/pubs/gtr/gtr_nrs76.pdf)

<sup>939</sup> Phillips, S. (2011, September 27). Burning questions: Quarantined cows give birth to dead calves. *StateImpact*. Retrieved from <http://stateimpact.npr.org/pennsylvania/2011/09/27/burning-questions-quarantined-cows-give-birth-to-dead-calves/>

<sup>940</sup> Penn State Extension. (2010, March). *Pennsylvania dairy farms and Marcellus shale, 2007–2010* (Rep.). Retrieved from <http://cce.cornell.edu/EnergyClimateChange/NaturalGasDev/Documents/PA%20Dairy%20Farms%20and%20Marcellus%202007%20to%202010.pdf>



from the ‘fracking’ operation going on at the property,” Mike Barrington, a state veterinarian said in a document obtained from the state Department of Environmental Quality by the *Times-Picayune*.<sup>941, 942</sup>

- August 1977 – A paper in the *Journal of Arboriculture* described how natural gas leaks in soil can damage plants and crops. The paper notes that vegetation dies in the vicinity of natural gas leaks. Due to the oxidation of methane by methane-consuming bacteria, gas leaks drive down the oxygen concentration to extremely low levels and cause carbon dioxide concentration to rise. The resulting low oxygen concentration is the greatest contributing factor in the death of trees and other vegetation near natural gas leaks.<sup>943</sup>

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<sup>941</sup> Schleifstein, M. (2011, March 27). Haynesville natural gas field is the most productive in the U.S. *The Times-Picayune*. Retrieved from [http://www.nola.com/politics/index.ssf/2011/03/haynesville\\_natural\\_gas\\_field.html](http://www.nola.com/politics/index.ssf/2011/03/haynesville_natural_gas_field.html)

<sup>942</sup> KSLA. (2009, April 28). Cows in Caddo Parish fall dead near gas well. *KSLA News*. Retrieved from <http://www.ksla.com/Global/story.asp?S=10268585>

<sup>943</sup> Davis, S. H., Jr. (1977). The effect of natural gas on trees and other vegetation. *Journal of Arboriculture*, 3(8), 153-154.

## Threats to the climate system

*Natural gas is not a climate-friendly fuel. Methane, which escapes from all parts of the natural gas extraction and distribution system, is a powerful greenhouse gas that traps 86 times more heat than carbon dioxide over a 20-year time frame. According to the best available evidence, fuel-switching that replaces coal with natural gas to generate electricity offers no clear climate benefits and likely represents a step backwards. As is now documented in many studies, fugitive methane emissions from U.S. drilling and fracking operations, storage, and ancillary infrastructure are higher than previously supposed. A significant proportion of these leaks are not preventable through engineering fixes. Indeed, some represent intentional venting during routine maintenance or during attempts to control pressure and prevent explosions during malfunctions. Venting takes place at all points along the supply chain, from well pads, pipelines, and compressor stations to liquefied natural gas (LNG) export terminals. A 2018 analysis of methane emissions from the U.S. oil and gas supply chain that used a combination of measurement methodologies found leakage rates 60 percent higher than reported by the U.S. Environmental Protection Agency (EPA) and concluded that natural gas is just as damaging as coal for the climate over a 20-year time frame. Collectively, a range of studies disprove the claim that natural gas is a transitional “bridge” fuel that can lower greenhouse gas emissions while renewable energy solutions are developed.*

*A sharp rise in global atmospheric methane concentrations began in 2007 and has accelerated since 2014. The causes for this spike are not yet fully understood and likely include both biogenic sources (livestock, agriculture, wetlands, landfills, forest fires) and fossil fuel sources. As both satellite and ground measurements reveal, U.S. methane emissions are responsible for 30-60 percent of the recent upsurge in global atmospheric methane concentrations. Most of this excess methane appears to represent fugitive emissions from U.S. oil and gas operations.*

*Many lines of evidence point to the important role of unconventional oil and gas extraction in driving greenhouse gas emissions upward. These include the atmospheric pattern of increased methane concentrations directly over intensively fracked areas of the United States; sharp upticks in global methane and co-occurring ethane levels that correspond to the advent of the U.S. fracking boom; and documentation of large pulses of methane released from storage facilities and other “super-emitting” sites. A major study from the National Aeronautics and Space Administration (NASA) in 2017 found that methane from biomass sources, such as fires, decreased over the time period 2001-2016 while fossil fuel sources of methane increased. Further, the widely touted claim that the U.S. fracking boom has contributed to recent declines in carbon dioxide emissions in the United States has been invalidated by research showing that almost all of the reductions in CO<sub>2</sub> emissions between 2007 and 2009 were the result of economic recession rather than coal-to-gas fuel switching. Other lines of research show that expanded use of natural gas impedes rather than encourages investments in, and deployment of, renewable energy infrastructure. In sum, fracking, as a major driver of rising methane emissions, is incompatible with climate stability and the goal of rapid decarbonization that it requires.*

- March 12, 2019 – Using aircraft, a team of researchers from multiple universities and institutions estimated emissions from both coal mines and shale gas wells in southwestern Pennsylvania. For coal, their results largely aligned with EPA estimates. However, for natural gas wells, emissions were five times higher than EPA figures. Because the volume of gas extracted per well is higher than in other shale basins, production-scaled methane emissions were still comparatively low, with carbon dioxide emissions from combustion remaining the dominant source of greenhouse gas emissions.<sup>944</sup>
- March 7, 2019 – Methane is a very strong greenhouse gas, with 120 times the power to trap heat than an equivalent amount of carbon dioxide. However, methane persists in the atmosphere for an average of only 12.4 years whereas carbon dioxide can linger for a century or more. Using a combination of approaches, a London team assessed the contribution of natural gas extraction to future greenhouse gas emissions in the United States, taking into account timing as well as magnitude of emissions and changing prices. They found that methane emitted further into the future—and therefore closer to the year where climate stabilization needs to take place—has a disproportionately large bearing on the overall climate impact of drilling and fracking activities, with long-lived gas fields having the most effect. “A key finding of this study is that the environmental and economic consequences of emissions are likely to rise with the age of a field, thus exposing long-lived assets to the greatest potential losses....Overall, our results suggest that future cumulative greenhouse gas emissions from existing US [gas] fields have a significant short-medium climate impact.” The authors recommend carbon pricing as a strategy to shorten the lifetime of long-lived gas fields. They also report that 40 percent of carbon dioxide output from natural gas is directly related to drilling activities.<sup>945</sup>
- February 28, 2019 – Australia’s LNG export industry contributed significantly to rising carbon emissions from that country in the 12 months prior to September 2018, according to Australia’s National Greenhouse Gas Inventory. Emissions from power plants fell during this same time period as the result of a 31 percent jump in renewable energy serving eastern Australia. These declines, however, were more than offset by soaring increases in industrial and fugitive emissions from Australia’s LNG plants.<sup>946</sup> LNG exports rose by one fifth in 2018.<sup>947</sup> This jump represents the third consecutive year of

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<sup>944</sup> Barkley, Z. R., Lauvaux, T., Davis, K. J., Deng, A., Fried, A., Weibring, P., . . . Dickerson, R. R. (2018). Estimating methane emissions from underground coal and natural gas production in southwestern Pennsylvania. *Geophysical Research Letters*, 46, 4531-4540. doi: 10.1029/2019GL082131

<sup>945</sup> Crow, D. J. G., Balcombe, P., Brandon, N., & Hawkes, A. D. (2019). Assessing the impact of future greenhouse gas emissions from natural gas production. *Science of the Total Environment*, 668, 1242-1258. doi: 10.1016/j.scitotenv.2019.03.048

<sup>946</sup> Commonwealth of Australia Department of Environment and Energy. (2018). *Quarterly update of Australia’s National Greenhouse Gas Inventory: September 2018*. Retrieved from <https://www.environment.gov.au/climate-change/climate-science-data/greenhouse-gas-measurement/publications/quarterly-update-australias-national-greenhouse-gas-inventory-sept-2018>

<sup>947</sup> Hannam, P. (2019, February 28). Annual emissions keep rising as gas jump counters power sector drop. *Sydney Morning Herald*. Retrieved from <https://www.smh.com.au/environment/climate-change/annual-emissions-keep-rising-as-gas-jump-counters-power-sector-drop-20190228-p510wu.html>

rising greenhouse gas emissions from Australia. The expansion in LNG production and export was identified as the major contributor to this trend.<sup>948</sup>

- February 27, 2019 – An international team investigated the climate and the public health harms attributable to fossil fuel combustion. Their global model estimated an avoidable excess mortality rate of 3.61 million deaths per year from air pollution alone. Air pollution also chemically reacts with dust to create aerosols that disrupt the hydrologic cycle and impede rainfall patterns. If fossil fuel burning ended, not only would deaths due to air pollution be avoided but additional lives would be saved as water and food security improved in densely populated areas of India, northern China, and central America. In sum, “a rapid phaseout of fossil fuel-related emissions and major reductions of other anthropogenic sources are needed to save millions of lives, restore aerosol-perturbed rainfall patterns, and limit global warming to 2 C°.”<sup>949</sup>
- February 12, 2019 – In southeastern Saskatchewan, Canada, conventional gas and oil drilling takes place side by side with unconventional drilling via fracking. In a first study of its kind, a St. Francis Xavier University research team directly compared methane emissions from both types of co-located wells. By conducting truck-based air sampling downwind from 645 conventional wells and 289 unconventional wells, the team found that 28 percent of conventional wells leaked methane compared to 32 percent of fracked wells. The bigger difference was in measures of mean emission intensities from the wells that were leaking. Leaking fracked wells emitted nearly three times as much methane (59 cubic meters of methane per day) as leaking conventional wells (20 cubic meters of methane per day). “Our results showed that unconventional sites in southeastern Saskatchewan emit about as often as nearby conventional sites, but with somewhat greater severity.”<sup>950</sup>
- February 5, 2019 – A team led by University of Maryland researchers conducted aircraft sampling in 2015 to assess leakage from drilling and fracking operations in the southwestern Marcellus Shale. Coalbeds were the likely source of more than 70 percent of the emitted methane. Of the methane that likely arose from shale gas wells, the estimated mean emission rate was 1.1 percent of the total natural gas extraction. These results were consistent with (but at the low end of) estimates determined by previous observational studies in this region. They indicate that the climate impact of natural gas combustion falls below that of coal. Nevertheless, the full range includes values up to 3.5

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<sup>948</sup> Cox, L., (2018, May 14). Gas boom fuels Australia’s third straight year of rising emissions. *Guardian*. Retrieved from <https://www.theguardian.com/environment/2018/may/14/gas-fuels-australias-third-straight-year-of-rising-emissions>

<sup>949</sup> Lelieveld, J., Klingmüller, K., Pozzer, A., Burnett, R. T., Haines, A., & Ramanathan, V. (2019). Effects of fossil fuel and total anthropogenic emission removal on public health and climate. *Proceedings of the National Academy of Sciences*, 116(15), 7192-7197. doi: 10.1073/pnas.1819989116

<sup>950</sup> Baillie, J., Risk, D., Atherton, E., O’Connell, E., Fougère, C., Bourlon, E., & MacKay, K. (2019). Methane emissions from conventional and unconventional oil and gas production sites in southeastern Saskatchewan, Canada. *Environmental Research Communications*, 1(1), 01003. doi: 1088/2515-7620/ab01f2

percent, which falls above the break-even point with coal over a 20-year time span.<sup>951</sup>

- February 5, 2019 – Sampling air from remote locations all over the world, an international team of atmospheric scientists confirmed a sharp rise in global atmospheric methane. This spike began in 2007 and has accelerated since 2014. The causes for the increase are not fully understood. The research team also documented, over the same time period, a shift in the carbon isotope ratio, which may signal a shift in the relative proportions of emissions from different sources. (These various methane sources include, for example, gas leaks, microbes, livestock, landfills, biomass burning.) Alternatively—or additionally—it may signal a decline in the oxidative capacity of the atmosphere, which breaks apart methane molecules. A change in the rate of methane destruction can also change the carbon isotope ratio. Either way, a sharp, ongoing increase in global methane concentrations was not predicted by the future greenhouse gas scenarios that were incorporated into the targets of the Paris Agreement. If the current increase continues, the goals of that treaty could be out of reach. “There is now urgent need to reduce methane emissions, especially from the fossil fuel industry... anthropogenic methane emissions are relatively very large and thus offer attractive targets for rapid reduction, which are essential if the Paris Agreement aims are to be attained.”<sup>952</sup>
- February 4, 2019 – Permafrost is soil that remains frozen year-round. If it thaws, microbes turn the carbon contained in the soil into carbon dioxide and methane. Because such a vast amount of carbon is held in permafrost, warming Arctic temperatures may release a large pulse of climate-destabilizing methane and so trigger an uncontrolled positive feedback loop. A study by an international team looked at the fate of permafrost under different scenarios of greenhouse gas mitigation, including some in which no progress is made toward decreasing fossil fuel-based emissions and others in which the targets of the Paris Agreement are met. In their analysis, the team determined the highest level of natural methane emissions that can be released from the Arctic by 2100. This level is considerably lower than likely anthropogenic methane emission levels over the same time period, which indicates that human-made emissions can be reduced sufficiently to limit methane-causing climate warming by 2100 even if the permafrost undergoes an uncontrolled emission feedback—but only if a committed, global effort to reduce fossil fuel use takes place very soon.<sup>953</sup> In a press release about this research, one of the authors of the study, Lena Höglund-Isaksson, said, “It is important to put the two estimates alongside each other to point out how important it is to urgently address methane emissions from human activities, in particular through a phase out of fossil fuels. It is important for everyone concerned about global warming to know that humans are the main source of methane emissions and that if we can control humans’ release of

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<sup>951</sup> Ren, X., Hall, D. L., Vinciguerra, T., Benish, S. E., Stratton, P. R., Ahn, D., . . . Dickerson, R. R. (2019).

Methane emissions from the Marcellus Shale in Southwestern Pennsylvania and Northern West Virginia based on airborne measures. *Journal of Geophysical Research Atmospheres*, 124, 1862-1878. doi: 10.1029/2018JD029690

<sup>952</sup> Nisbet, E. G., Manning, M. R., Dlugokencky, E. J., Fisher, R. E., Lowry, D., Michel, S. E., . . . White, J. W. C. (2019). Very strong atmospheric methane growth in the four years 2014-2017: Implications for the Paris Agreement. *Global Biogeochemical Cycles*, 33(3), 318-342. doi: 10.1029/2018GB006009

<sup>953</sup> Christensen, T. R., Arora, V. K., Gauss, M., Höglund-Isaksson, L., & Parmentier, F.-J. W. (2019). Tracing the climate signal: Mitigation of anthropogenic methane emissions can outweigh a large Arctic natural emission increase. *Scientific Reports*, 9, 1146. doi: 10.1038/s41598-018-37719-9

methane, the problem of methane release from the thawing Arctic tundra is likely to remain manageable.”<sup>954</sup>

- December 4, 2018 – Research firm Rystad Energy reported that gas flaring in the west Texas Permian Basin has doubled since 2017. Oil wells in the region pump out large volumes of associated natural gas. Without pipelines to bring the gas to burner tips, and in order to maintain the rapid pace of oil drilling, operators simply waste the gas—worth more than \$1 million per day—by burning it off in flare stacks. Flaring permits are limited to 45 days but are now routinely extended for up to six continuous months.<sup>955</sup>
- November 23, 2018 – In a report commissioned by the Obama administration in 2016, the U.S. Geological Survey (USGS) provided estimates on greenhouse gas emissions associated with the extraction and combustion of fossil fuels produced from federal lands. Between 2005 and 2014, fully one-quarter of all U.S. carbon emissions come from fossil fuels that were extracted from public lands. The report found that forests on federal lands can offset some of these emissions but only by 15 percent. Fossil fuels are extracted from public lands in 28 states with more than half the total carbon emissions coming from Wyoming.<sup>956, 957</sup>
- October 29, 2018 – The Basin Methane Reconciliation Study was a large-scale field investigation that brought together more than 80 scientists from multiple institutions. They examined why different methods of accounting for methane emissions from natural gas drilling sites vary so widely across the United States. The study took place in 2015 in Arkansas’ Arkoma Basin and utilized both bottom-up and top-down approaches, which is to say, measurements were taken on the ground at selected facilities as well as in the atmosphere over the region, via aircraft. This type of concurrent dual analysis had never been attempted before. The study revealed spikes of high emissions that occur during daytime maintenance operations, as when, for example, liquids are being removed from a well and natural gas is freely vented into the air for the duration of that process. The high temporal variability and episodic nature of methane emissions likely explain the persistent gap between the two accounting methods and mean that researchers who attempt to determine how much methane is escaping from drilling and fracking operations require “detailed activity data, unfettered and unbiased site access, and time-resolved operations data.” This type of study necessarily requires cooperation with

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<sup>954</sup> International Institute for Applied Systems Analysis. (2019, February 6). Diffusing the methane bomb: We can still make a difference [Press release]. Retrieved from <https://www.sciencedaily.com/releases/2019/02/190206104538.htm>

<sup>955</sup> Blum, J. (2018, December 4). Permian Basin gas flaring has nearly doubled in a year. *Houston Chronicle*. Retrieved from <https://www.houstonchronicle.com/business/energy/article/Record-Permian-gas-flaring-has-nearly-doubled-in-13443024.php>

<sup>956</sup> Merrill, M. D., Sleeter, B. M., Freeman, P. A., Liu, J., Warwick, P. D., & Reed, B. C. (2018). Federal lands greenhouse gas emissions and sequestration in the United States—Estimates for 2005–14. *U.S. Geological Survey Scientific Investigations Report 2018–5131*. doi: 10.3133/sir20185131

<sup>957</sup> Aton, A. (2018, November 27). Fossil fuel extraction on public lands produces one quarter of U.S. emissions. *E&E News*. Retrieved from <https://www.scientificamerican.com/article/fossil-fuel-extraction-on-public-lands-produces-one-quarter-of-u-s-emissions/>

industry employees.<sup>958</sup>

- August 1, 2018 – The Groningen natural gas field in the northern Netherlands is one of Europe’s major gas fields where extraction, gas processing, and gas storage all take place. It is also a region with intensive agriculture and cattle operations. An international research team investigated methane emissions there with the intent of distinguishing between methane from fossil fuel sources and methane arising from livestock, wetlands, and agriculture. Using both ground and aircraft measurements, the researchers determined that emissions from oil and gas operations account for 20 percent of regional methane, with the remainder from biogenic sources. That figure for fossil fuel sources is, nevertheless, ten times higher than the 1.9 percent that was estimated by previous inventories. Ground-based measurements at extraction, processing, and storage sites found low emission rates compared to gas production facilities in the United States. Production volume was a poor predictor of emission rates. Even wells with no production still had emissions.<sup>959</sup>
- August 1, 2018 – California’s climate goals call for an 80 percent reduction in emissions by 2050. With this goal in mind, a Lawrence Berkeley National Laboratory team set out to estimate what fraction of California’s greenhouse gas emissions represent methane emissions from residential homes, including leakage from gas pipes, stovetops, combustion appliance pilot lights, and forced air furnaces. Total methane emissions from California homes represent 15 percent of the total emissions from the natural gas sector in California and represent two percent of the state’s total methane emissions, as calculated in the 2015 state inventory. The team also found that emissions from pilot lights constitute a significant fraction as do flames in domestic hot water heaters. “While methane emissions from houses are small compared to most sources, California’s ambitious goals...suggest value in testing and repairing obvious leaks in residential gas lines, modernizing combustion appliances to move away from pilot lights, and gradually increasing the use of non-fossil fuel energy sources for residential space and hot water heating and cooking.”<sup>960</sup>
- July 10, 2018 – In 2015, as part of a follow-up study, a research team used helicopters to measure methane emission patterns at 353 well pads in North Dakota’s Bakken Shale that had been surveyed in the same way in 2014. In the interim, 21 newly producing well pads were added to the sampling area. They found that the individual well pads that emitted methane in 2014 were far more likely to be still emitting in 2015 than would be expected by chance alone. The reasons for this persistent leaking were not identified but potentially

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<sup>958</sup> Vaughn, T. L., Bell, C. S., Pickering, C.K., Schwietzke, S., Heath, G. A., Pétron, G., ... & Nummedal, D. (2018). Temporal variability largely explains top-down/bottom-up difference in methane emission estimates from a natural gas production region. *Proceedings of the National Academy of Sciences*, 115(46), 11712-11717. doi: 10.1073/pnas.1805687115

<sup>959</sup> Yacovitch, T. I., Neininger, B., Herndon, S. C., Denier van der Gon, H., Jonkers, S., Hulskotte, J., . . . Zavala-Araiza, D. (2018). Methane emissions in the Netherlands: The Groningen field. *Elementa: Science of the Anthropocene*, 6(57). doi: 10.1525/elementa.308

<sup>960</sup> Fischer, M. L., Chan, W. R., Jeong, S., & Zhu, Z. (2018). *Natural gas methane emissions from California homes*. California Energy Commission, CEC-500-2018-021. Retrieved from <https://www.energy.ca.gov/2018publications/CEC-500-2018-021/CEC-500-2018-021.pdf>

include tanks without vapor recovery systems, overpressurization, undersized flaring systems, stuck or clogged valves, and “poorly designed equipment.” Altogether, researchers quantified 33 plumes of methane and ethane arising from these well pads.<sup>961</sup>

- June 21, 2018 – An analysis of methane leaks from the U.S. oil and gas supply chain found that natural gas is just as damaging as coal for the climate over a 20-year time frame. This study combined on-the-ground measurements of leaks at selected facilities (bottom-up methods) with data collected from the atmosphere via aircraft (top-down methods). Based on the results, the authors estimated that roughly 2.3 percent of all the natural gas extracted in the United States escapes into the air. This estimated level of leakage was 60 percent higher than the EPA’s estimate of 1.4 percent. The authors believe their emissions estimate is the more accurate because they used helicopters to capture episodic releases of large plumes of methane caused by “abnormal operating conditions” and “failure-prone systems” that were likely missed by the sampling methods used for EPA’s greenhouse gas inventory. Liquid storage tank hatches and vents were the source of most of acute incidents.<sup>962</sup>
- December 20, 2017 – A major study led by NASA researchers concluded. that fossil fuel sources are driving the sharp uptick in global atmospheric concentrations of methane since 2006. Using satellite measurements and isotopic analysis, the team showed that methane from biomass sources, such as fires, decreased over the time period 2001-2016 while fossil fuel sources of methane increased. These findings helped reconcile conflicting results from other previous studies.<sup>963</sup>
- October 17, 2017 – Using planes, an international team of researchers measured regional airborne methane and ethane emission rates from the Alberta oil and gas fields in Canada. They compared these results to emissions reported by the industries themselves, as part of an accounting system that requires operators to report flaring and venting volumes, and found large discrepancies. Based on the amounts of methane and ethane detected in the atmosphere above the oil and gas fields, the reported industry emissions in this region should be  $2.5 \pm 0.5$  times higher. Such large discrepancies between actual methane emissions and industry-provided data represent a “reporting gap” and present a critical challenge when determining policy. Proposed regulations in Canada currently call for reducing methane emissions from Canadian fracking operations by 45 percent. However, these data indicate that most of the methane emissions from these operations arise from

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<sup>961</sup> Englander, J. G., Brandt, A. R., Conley, S., Lyon, D. R., & Jackson, R. B. (2018). Aerial interyear comparison and quantification of methane emission persistence in the Bakken Formation of North Dakota, USA. *Environmental Science & Technology*, 52(15), 8946-8953. doi: 10.1021/acs.est.8b01665

<sup>962</sup> Alvarez, R. A., Zavala-Araiza, D., Lyon, D. R., Allen, D. T., Barkley, Z. R., Brandt, A. R., . . . Hamburg, S. P. (2018). Assessment of methane emissions from the U.S. oil and gas supply chain. *Science*, 361(6398): 186-188. doi: 10.1126/science.aar7204

<sup>963</sup> Worden, J. R., Bloom, A. A., Pandey, S., Jiang, Z., Worden, H. M., Walker, T. W., . . . Röckmann, R. (2017). Reduced biomass burning emissions reconcile conflicting estimates of the post-2006 atmospheric methane budget. *Nature Communications*, 2227. doi: 10.1038/s41467-017-02246-0



fugitive leaks that are not being measured at all and/or from episodes of unreported venting.<sup>964</sup>

- July 18, 2017 – A team of 15 climate scientists led by James Hansen at Columbia University conducted a study on the growth rate of greenhouse gas climate forcing, which has accelerated by 20 percent in the past decade. (Climate forcing is the difference between the amount of the sun’s energy that is absorbed by the Earth and amount that radiates back into space.) The authors note that methane (CH<sub>4</sub>) is the largest climate-forcing gas after carbon dioxide. With an atmospheric lifetime of only about ten years, “there is potential to reduce climate forcing rapidly if CH<sub>4</sub> sources are reduced.” However, “there is a danger of increased leakage with expanded shale gas extraction.” Noting that the speed of ice sheet melting and sea level rise are difficult to predict, the authors assert that targets for limiting global warming should aim to keep global temperatures close to the preindustrial Holocene range rather than allow them to rise to those found during the prior Eemian period, when sea levels were 6-9 meters higher than today. Such targets require immediate phase-out of fossil fuel emissions, along with profound changes in farming and forestry practices. A delay in taking these measures to minimize irreversible climate impacts means that the next generation will be required to undertake risky, expensive, large-scale CO<sub>2</sub> extraction practices, such as carbon capture. “If high fossil fuel emissions continue, a great burden will be placed on the young. . . . Continued high fossil fuel emissions unarguably sentences young people to either a massive, implausible cleanup or growing deleterious climate impacts or both.”<sup>965</sup>
- July 8, 2017 – An investigative report from the Inter Press Service News Agency examined the climate impacts of methane emissions from Mexico, which is sixth among the world’s nations in technically recoverable shale gas reserves (after China, Argentina, Algeria, the United States, and Canada). Mexico’s current energy policy, introduced in 2014, emphasizes the exploitation of shale gas using fracking. Using data from the state-owned energy company Petroleos Mexicanos (PEMEX), the Inter Press Service story documents that as of 2017, more than 900 wells, located in six of Mexico’s 32 states, have been drilled and fracked. High volumes of methane are emitted during venting, and methane emissions have been increasing sharply. In 2016, the total methane emissions from Mexico’s PEMEX Exploration and Production operations were 641,517 metric tons, 38 percent higher than the previous year. According to researcher Ramón Torres, of the National Autonomous University of Mexico, who is quoted in the story, “Current regulations are based on best practices, but the philosophy of environmental protection has been abandoned. Exploitation is deepening inequities in a negative way, such as environmental impact. It is irresponsible to auction reserves without a proper evaluation of environmental and social impacts.”<sup>966</sup>

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<sup>964</sup> Johnson, M. R., Tyner D. R., Conley, S., Schwietzke, S., & Zavala-Araiza, D. (2017). Comparisons of airborne measurements and inventory estimates of methane emissions in the Alberta upstream oil and gas sector. *Environmental Science & Technology*. 51(21), 13008–13017. doi: 10.1021/acs.est.7b03525

<sup>965</sup> Hansen, J., Sato, M., Kharecha, P., von Schuckmann, K., Beerling, D. J., Cao, J. . . . Ruedy, R. (2017). Young people’s burden: Requirement of negative CO<sub>2</sub> emissions. *Earth System Dynamics*, 8, 577-616. doi: 10.5194/esd-8-577-2017

<sup>966</sup> Godoy, E. (2017, July 8). Mexico’s methane emissions threaten the environment. *Inter Press Service News Agency*. Retrieved from <http://www.ipsnews.net/2017/07/mexicos-methane-emissions-threaten-environment/>

- June 19, 2017 – A study that measured methane emissions from various components of drilling and fracking equipment on well pads located in four different shale basins in Colorado, Utah, Arkansas, and Wyoming found widely varying results. In Colorado and Utah, a small percentage of well pads leaked the vast majority of methane, whereas leakage was more equitably distributed among wells in Wyoming. The research team also found variations that were dependent on oil/gas/water content as well as on the numbers of wells per well pad. In sum, emissions from well pads contributed significantly to basin-wide methane emissions but varied depending on location. [Note: the authors identify XTO Energy as a cost share partner in this study.]<sup>967</sup>
- April 18, 2017 – San Juan Basin in the four-corner region of Utah, Arizona, New Mexico, and Colorado, is one of the largest coal-bed methane producing regions in North America. Between 2003 and 2015, natural gas production declined, and yet, as revealed by atmospheric sampling from aircraft flying over the basin, methane emissions did not decrease during this same time period. These results confirm earlier findings from a satellite study that also showed no declines in regional methane concentrations in spite of significant declines in natural gas production. According to the authors, the likely explanation for the region’s persistent, elevated methane levels is increased oil drilling in the basin.<sup>968</sup>
- February 9, 2017 – Using ground-based monitoring methods, a team led by Drexel University researchers monitored a range of emissions, including methane, in two intensively drilled regions of the Marcellus Shale basin in Pennsylvania. The goal was to understand the concentrations and sources of relevant air pollutants that had previously been reported as impacts of drilling and fracking operations. Airborne methane concentrations were higher in southwestern Pennsylvania as compared to northeastern Pennsylvania. The authors conclude that urban-like levels of air pollutants in rural Pennsylvania are likely due to emissions from oil and gas operations in the Marcellus Shale basin.<sup>969</sup>
- January 9, 2017 – A modeling study found that short-lived greenhouse gases, such as methane, contribute to thermal expansion of the ocean over much longer time scales than their brief atmospheric lifetimes might otherwise predict. “Actions taken to reduce

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<sup>967</sup> Robertson, A. M., Edie, R., Snare, D., Soltis, J., Field, R. A., Burkhart, M. D., ... Murphy, S. M. (2017). Variation in methane emission rates from well pads in four oil and gas basins with contrasting production volumes and compositions. *Environmental Science & Technology*, 51(15), 8832–8840. doi: 10.1021/acs.est.7b00571

<sup>968</sup> Smith, M. L., Gvakharia, A., Kort, E. A., Sweeney, C., Conley, S. A., Faloon, I., ... Wolter, S. (2017). Airborne quantification of methane emissions over the four corners region. *Environmental Science & Technology*, 51(10), 5832–5837. doi: 10.1021/acs.est.6b06107

<sup>969</sup> Goetz, J. D., Avery, A., Werden, B., Floerchinger, C., Fortner, E. C., Wormhoudt, J., ... DeCarlo, P. F. (2017). Analysis of local-scale background concentrations of methane and other gas-phase species in the Marcellus Shale. *Elementa: Science of the Anthropocene*, 5(1). doi: <https://doi.org/10.1525/elementa.182>

emissions of short-lived gases could mitigate centuries of additional future sea-level rise.”<sup>970</sup>

- December 12, 2016 – As part of the interdisciplinary Global Carbon Project, a consortium of scientists undertook a meta-analysis that synthesizes many hundreds of individual studies in order to better understand the global methane cycle. Integrating atmospheric measurements with ground-based data, the researchers found more uncertainty in the emissions from natural sources than from human activities. For the 2003–2012 decade, global methane emissions were 558 teragrams per year (range of 540–568), with 60 percent of global methane emissions attributed to anthropogenic sources of all kinds and with a significant contribution (likely at least 39 percent) from oil and gas production operations.<sup>971</sup>
- December 12, 2016 – An editorial published in *Environmental Research Letters* by an international team of scientists urges immediate attention to quantify and reduce methane emissions. “Unlike CO<sub>2</sub>, atmospheric methane concentrations are rising faster than at any time in the past two decades and, since 2014, are now approaching the most greenhouse-gas-intensive scenarios.” The authors present methods of evaluating anthropogenic and biogenic sources of methane, as from agricultural practices and project future methane emissions.<sup>972</sup>
- November 8, 2016 – The government of Scotland released a report confirming that the pursuit of unconventional oil and gas extraction would make more difficult the nation’s goal of meeting its climate targets on greenhouse gas emissions.<sup>973</sup>
- November 1, 2016 – A life cycle analysis of greenhouse gas emissions from fracking operations in the Marcellus Shale region found that upstream activities associated with the use and transportation of chemicals, water, and sand mining contributed relatively lower emissions than downstream phases of the fracking process, which include gas combustion, methane leakage, venting, and flaring.<sup>974</sup>
- October 5, 2016 – A new inventory of worldwide methane emissions from various sources finds that methane emissions from the fossil fuel industry are 20-60 percent

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<sup>970</sup> Zickfeld, K., Solomon, S., & Gilford, D. M. (2017) Centuries of thermal sea-level rise due to anthropogenic emissions of short-lived greenhouse gases. *Proceedings of the National Academy of Sciences*, 114(4), 657-662. doi: 10.1073/pnas.1612066114

<sup>971</sup> Saunio, M., Bousquet, P., Poulter, B., Peregon, A., Ciais, P., Canadell, J. G., ... Zhu, Q. (2016). The global methane budget 2000–2012. *Earth System Science Data*, 8, 697–751. doi: 10.5194/essd-8-697-2016

<sup>972</sup> Saunio, M., Jackson, R. B., Bousquet, P., Poulter, B., & Canadell, J.G. (2016). The growing role of methane in anthropogenic climate change. *Environmental Research Letters*, 11, 120207. doi: 10.1088/1748-9326/11/12/120207

<sup>973</sup> Committee on Climate Change. (2016, November 8). Scottish unconventional oil and gas: Compatibility with Scottish greenhouse gas emissions targets. Retrieved from <http://www.gov.scot/Resource/0050/00509324.pdf>

<sup>974</sup> Sibrizzi, C., & LaPuma, P. (2016). An assessment of life cycle greenhouse gas emissions associated with the use of water, sand, and chemicals in shale gas production of the Pennsylvania Marcellus Shale. *Journal of Environmental Health*, 79(4), 8-15. Retrieved from <https://www.neha.org/node/58673>

higher than previously thought.<sup>975</sup> This discovery, based on isotopic fingerprinting of methane sources, has prompted researchers to call for revisions to current climate prediction models and for a renewed emphasis on reducing methane emissions as a necessary tool for combating climate change.<sup>976</sup>

- September 26, 2016 – In ratifying the Paris Climate Agreement, the United States pledged to reduce its greenhouse gas emissions 26-28 percent by 2025 as compared to 2005 levels. A research team from Lawrence Berkeley National Laboratory found that the United States is on track to miss this target, in large part because of soaring methane emissions.<sup>977, 978</sup>
- September 12, 2016 – Using isotopic analysis and archived air samples collected from 1977 to 1998, as well as more contemporary data, a team of researchers from Oregon presented “strong evidence” that methane emissions from fossil fuel sectors were approximately constant in the 1980s and 1990s but then increased significantly between 2000 and 2009. Over the same time period, methane emissions from biomass burning, rice cultivation, and wetlands decreased. These results contradict the findings of earlier studies that used atmospheric ethane as a marker for methane and had concluded that fugitive fossil fuel emissions fell during much of that period. (More recent studies show that ethane emissions are increasing again.)<sup>979, 980, 981</sup>
- July 11, 2016 – A group of 130 environmental and health organizations signed a formal complaint with the Inspector General of the U.S. Environmental Protection Agency (EPA) about a pivotal 2013 study that was published in the *Proceedings of the National Academies of Sciences* and which was led by University of Texas chemist David T. Allen. The letter accused Allen of “systemic fraud, waste, and abuse” for his reliance on an inaccurate measurement device that was known to underestimate methane levels.

<sup>975</sup> Schwietzke, S., Sherwood, O. A., Bruhwiler, L. M. P., Miller, J. B., Etiope, G., Dlugokencky E. J., . . . Tans, P. (2016). Upward revision of global fossil fuel methane emissions based on isotope database. *Nature*, 538. 88-91. doi: 10.1038/nature19797

<sup>976</sup> Vaughan, A. (2016, October 5). Fossil fuel industry’s methane emissions far higher than thought. *The Guardian*. Retrieved from <https://www.theguardian.com/environment/2016/oct/05/fossil-fuel-industrys-methane-emissions-far-higher-than-thought>

<sup>977</sup> Greenblatt, J. R., & Wei, M. (2016). Assessment of the climate commitments and additional mitigation policies of the United States. *Nature Climate Change*, 6, 1090-93. doi: 10.1038/nclimate3125

<sup>978</sup> Mooney, C. (2016, September 26). The U.S. is on course to miss its emissions goals, and one reason is methane. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/energy-environment/wp/2016/09/26/the-u-s-is-on-course-to-miss-its-emissions-goals-and-one-reason-is-methane/?utm\\_term=.80df24676a21](https://www.washingtonpost.com/news/energy-environment/wp/2016/09/26/the-u-s-is-on-course-to-miss-its-emissions-goals-and-one-reason-is-methane/?utm_term=.80df24676a21)

<sup>979</sup> Rice, A. L., Butenhoff, C. L., Teama, D. G., Röger, F. H., Khalil, M. A. K., & Rasmussen, R. A. (2016). Atmospheric methane isotopic record favors fossil sources flat in 1980s and 1990s with recent increase. *Proceedings of the National Academy of Sciences*, 113(39). 10791–10796. doi: 10.1073/pnas.1522923113

<sup>980</sup> Harvey, C. (2016, September 13). Scientists may have solved a key mystery about the world’s methane emissions. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/energy-environment/wp/2016/09/13/the-answer-to-the-global-methane-mystery-fossil-fuels-a-study-finds/?utm\\_term=.64a94b9abf4e](https://www.washingtonpost.com/news/energy-environment/wp/2016/09/13/the-answer-to-the-global-methane-mystery-fossil-fuels-a-study-finds/?utm_term=.64a94b9abf4e)

<sup>981</sup> von Kaenel, C. (2016, September 13). Debate rises over real source of higher methane emissions. *Scientific American*. Retrieved from <https://www.scientificamerican.com/article/debate-rises-over-real-source-of-higher-methane-emissions/>

Partially funded by the oil industry, Allen's study reported very low methane emission rates as part of a large survey of 190 drilling and fracking sites across the nation. That flawed study was influential, said complainants, in preventing EPA from recognizing the magnitude of methane leakage from drilling and fracking operations.<sup>982</sup> (See also the entry below for March 24, 2015.)

- June 17, 2016 – A comparative assessment of emerging methods for measuring methane emissions from different sources recommends combining analytic methods with chemical mass balance (CMB) methods. The CMB system is currently used in the Barnett Shale oil and gas production region in Texas as an approach to tracing methane emissions back to their sources.<sup>983</sup>
- May 25, 2016 – As part of the first field study to directly measure methane emissions from the heavily drilled Bakken Shale formation in northwestern North Dakota, a team led by atmospheric chemist Jeff Peischl at NOAA flew research aircraft over the region in May 2014. The researchers derived a methane emission rate of 275,000 tons of methane per year, which is similar to the rate of methane leakage in the Front Range area of Colorado but significantly lower than previous studies of the Bakken area that relied on satellite remote sensing data during an earlier time period (2006-2011). Analyzing the chemical composition of air samples, the NOAA team determined that almost all of the methane originated with oil and gas operations, rather than with natural or agricultural sources, and estimated a leakage rate of 4.2-8.4 percent.<sup>984</sup> Scaled to production, this emission rate is slightly lower than that estimated by EPA in its recently revised inventory.<sup>985, 986</sup> (See April 15, 2016 entry below.)
- April 15, 2016 – In its 21<sup>st</sup> annual greenhouse gas inventory, which includes 2014 data, the EPA increased its leakage assessment from oil and gas operations by 34 percent. For oil production alone, the EPA more than doubled its estimates of methane emissions. Further, in an admission that the agency had been historically underestimating methane leaks, the EPA also retroactively increased estimates of past emissions from the fossil

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<sup>982</sup> Johnson, J. (2016, July 11). Pivotal study on methane leaks from U.S. oil and natural gas wells under fire. *Chemical & Engineering News*. Retrieved from <http://cen.acs.org/articles/94/i28/Pivotal-study-methane-leaks-US.html>

<sup>983</sup> Allen, D. (2016). Attributing atmospheric methane to anthropogenic emission sources. *Accounts of Chemical Research*, 49, 1344–1350. doi: 10.1021/acs.accounts.6b00081

<sup>984</sup> Peischl, J., Karion, A., Sweeney, C., Kort, E. A., Smith, M. L., Brandt, A. R., . . . Ryerson, T. B. (2016). Quantifying atmospheric methane emissions from oil and natural gas production in the Bakken shale region of North Dakota. *Journal of Geophysical Research: Atmospheres*, 121. doi: 10.1002/2015JD024631

<sup>985</sup> National Oceanic and Atmospheric Administration. (2016, May 16). *North Dakota's Bakken oil and gas field leaking 275,000 tons of methane per year* [Press release]. Retrieved from <http://www.noaa.gov/news/north-dakota-s-bakken-oil-and-gas-field-leaking-275000-tons-of-methane-year>

<sup>986</sup> MacPherson, J. (2016, May 11). A new study says the oil-producing region of North Dakota and Montana leaks 275,000 tons of methane annually. *U.S. News & World Report*. Retrieved from <http://www.usnews.com/news/science/articles/2016-05-11/study-bakken-oil-field-leaks-275-000-tons-of-methane-yearly>

fuel sector as expressed in prior inventories.<sup>987, 988</sup> In an accompanying news release, the agency said, “Data on oil and gas show that methane emissions from the sector are higher than previously estimated. The oil and gas sector is the largest emitting-sector for methane and accounts for a third of total U.S. methane emissions.”<sup>989</sup> Past EPA inventories had identified livestock as the number one source of U.S. methane. These annual inventories fulfill the EPA’s obligations under the United Nations Framework Convention on Climate Change, signed and ratified by the United States in 1992, and attempt to identify and quantify U.S. anthropogenic sources and sinks of greenhouse gases for the time period 1990 and forward. The upward revision in both past and current inventories is a reflection of changing methodologies for measuring methane leaks.<sup>990</sup> Older methods included the incorporation of “bottom-up” data supplied by the oil and gas industry, without attention to high-emitting or super-emitting sources or possible sources of error introduced by flawed measuring equipment. In addition, the use of a Global Warming Potential multiplier of 25 for methane, which is based on a 100-year time horizon, rather than 86 for a 20-year time horizon, has come under sustained criticism given the urgency of the climate crisis.<sup>991, 992</sup>

- April 7, 2016 – Since 2009, corresponding to the advent of the U.S. shale gas boom, North American ethane emissions have increased by 5 percent per year. This trend represents a reversal of a previous multi-decade decline (mid-1980s until the end of the 2000s) in the abundance of atmospheric ethane that had been attributed to the reduction of fugitive emissions from fossil fuel sources. These are the findings of an international research team, which analyzed remote sensing data gathered by the Network for the Detection of Atmospheric Composition Change at globally distributed ground-based sites. Ethane is a volatile organic compound (VOC) that readily reacts with nitrogen oxides in the presence of sunlight to create ground-level ozone (smog). Also a potent greenhouse gas, ethane is co-released along with methane from drilling and fracking sites. The source of two-thirds of the ethane in Earth’s atmosphere is leakage from natural gas wells and pipelines. Because ethane is co-emitted with methane and can serve as a marker for it, this documentation of a sharp, recent uptick in atmospheric ethane is part of a larger body of evidence suggesting that U.S. drilling and fracking operations are

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<sup>987</sup> U.S. Environmental Protection Agency. (2016, April 15). *Inventory of U.S. greenhouse gas emissions and sinks: 1990-2014*. Retrieved from <https://www.epa.gov/sites/production/files/2016-04/documents/us-ghg-inventory-2016-main-text.pdf>

<sup>988</sup> Johnson, J. (2016, April 25). Oil, natural gas operations now top U.S. methane emitters. *Chemical & Engineering News*. Retrieved from <http://cen.acs.org/articles/94/i17/Oil-natural-gas-operations-top.html?type=paidArticleContent>

<sup>989</sup> U.S. Environmental Protection Agency. (2016, April 15). EPA publishes 21<sup>st</sup> annual U.S. greenhouse gas inventory [Press release]. Retrieved from <https://www.epa.gov/newsreleases/epa-publishes-21st-annual-us-greenhouse-gas-inventory>

<sup>990</sup> Mooney, C. (2016, April 15). The U.S. has been emitting a lot more methane than we thought, says EPA. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/energy-environment/wp/2016/04/15/epa-issues-large-upward-revision-to-u-s-methane-emissions/?utm\\_term=.eca9c599ff09](https://www.washingtonpost.com/news/energy-environment/wp/2016/04/15/epa-issues-large-upward-revision-to-u-s-methane-emissions/?utm_term=.eca9c599ff09)

<sup>991</sup> Sumner, T. (2016, April 14). EPA underestimates methane emissions. *ScienceNews*. Retrieved from <https://www.sciencenews.org/article/epa-underestimates-methane-emissions>

<sup>992</sup> Profeta, T. (2016, March 3). Study, EPA spotlight methane emissions from oil and gas industry. *National Geographic*. Retrieved from <http://voices.nationalgeographic.com/2016/03/03/study-epa-spotlight-methane-emissions-from-oil-and-gas-industry/>

driving up global methane levels.<sup>993</sup> (See also entry dated June 13, 2016 in Air Pollution section].)

- April 5, 2016 – A research team using infrared cameras and helicopters demonstrated that between 1 and 14 percent of oil and gas well pads surveyed were high emitters of hydrocarbons and VOCs, with the greatest number observed in oil producing areas and in areas with horizontal drilling.<sup>994</sup> While some emissions were intentional or part of routine maintenance operations, fugitive, unplanned releases (as from malfunctioning equipment) were also common, as were combustion emissions (as from flares and compressor engine exhaust). Tank vents and hatches were the origin of the vast majority (>90 percent) of detected large emission sources, deeply undercutting the assumption in the EPA’s Oil & Gas Emission Estimation Tool of 100 percent capture efficiency by tank control systems. While emissions tended to be higher during the first few months of well production, predicting which wells or other sources would become high emitters was not possible. The lead author, speaking to *InsideClimate News*, concluded that the work “really demonstrates the importance of things like continuous detection or frequent monitoring to find these high emission sites.”<sup>995</sup>
- March 10, 2016 – Attempting to explain a methane plateau between 1999 and 2006 within otherwise almost continuously increasing levels of atmospheric methane since the dawn of the industrial revolution, an international team of atmospheric scientists reconstructed the global history of methane and used isotopic carbon fingerprinting to parse the sources of its emission. Thermogenic emissions were assumed to result from fossil-fuel sources, while biogenic sources were assumed to arise from wetlands and agricultural operations. Based on a geographic distribution of methane revealed by remote sensing, the authors concluded that agricultural emissions, especially increases in livestock inventories and rice cultivation, were the most likely drivers of observed global methane increases from 2006 to 2014.<sup>996</sup> These results stand in contrast to other contemporaneous and recent studies that have supplied evidence for the role of oil and gas extraction in the recent upsurge in atmospheric methane.<sup>997</sup> (See entry for February 16, 2016 below.)

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<sup>993</sup> Franco, B., Mahieu, E., Emmons, L. K., Tzompa-Sosa, Z. A., Fischer, E. V., Sudo, K., . . . Walker, K. A. (2016). Evaluating ethane and methane emissions associated with the development of oil and natural gas extraction in North America. *Environmental Research Letters*, 11. doi: 10.1088/1748-9326/11/4/044010

<sup>994</sup> Lyon, D. R., Alvarez, R. A., Zavala-Araiza, D., Brandt, A. R., Jackson, R. B., & Hamburg, S. P. (2016). Aerial surveys of elevated hydrocarbon emissions from oil and gas production sites. *Environmental Science & Technology*, 50, 4877–4886. doi: 10.1021/acs.est.6b00705

<sup>995</sup> McKenna, P. (2016, April 8). Researchers find no shortcuts for spotting wells that leak the most methane. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/07042016/big-methane-leaks-superemitters-oil-gas-production-climate-change-edf>

<sup>996</sup> Schaefer, H., Fletcher, S. E. M., Veidt, C., Lassey, K. R., Brailsford, G. W., Bromley, T. M., . . . White, J. W. C. (2016, March 10). A 21<sup>st</sup> century shift from fossil-fuel to biogenic methane emissions indicated by <sup>13</sup>CH<sub>4</sub>. *Science*. doi: 10.1126/science.aad2705

<sup>997</sup> McKenna, P. (2016, March 10). The mystery of the global methane rise: Asian agriculture or U.S. fracking? *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/10032016/mysterious-global-methane-rise-asian-agriculture-or-us-fracking>

- February 16, 2016 – A Harvard-led team used both satellite retrievals and surface observations to estimate that methane emissions in the United States increased by more than 30 percent over the past twelve years. These findings, which contradict the 10 percent decline reported by the EPA, suggest that the United States could be responsible for 30-60 percent of the recent global spike in atmospheric methane.<sup>998, 999</sup> Since 2015, research on atmospheric methane has frequently relied on an “inverse method” to optimize emission estimates by combining “bottom-up” and “top-down” data, yet data from different sources have not yielded consistent estimates of methane emissions and levels. Three major sources (Wecht et al. [2014], Miller et al. [2013], and Turner et al. [2015]) all found maximum emissions in the South Central United States, with spatial overlaps that made separating livestock sources from oil and gas sources difficult. Taking into account the time period investigated by differing studies reveals an increasing trend in methane emissions, with an increase of 38 percent from 2004 to 2011, a period of greatly increasing drilling activity. This trend is confirmed by analyzing temporal trends in satellite data. While this account still differs from the EPA’s inventory in 2014 showing a 3 percent decrease in oil and gas emissions over that same time period, the EPA’s data presumed better control of measured leaks, which may not correlate with better control of overall emissions.
- January 29, 2016 – Working in the Marcellus Shale Basin, a Carnegie Mellon research team compared methane emissions from older conventional gas wells (those that were vertically drilled) and newer, unconventional gas wells (those that combined fracking with horizontal drilling). Measured by facility, the mean emission rate for unconventional wells was 23 times higher than that of conventional wells. This difference, in part, was attributed to the larger size of unconventional well pads, which, typically, have multiple wells per pad, more ancillary equipment, and produce more gas. When corrected for production, the conventional wells leaked more—that is to say, they lost a comparably larger fraction of methane per unit of production—likely due to “unresolved equipment maintenance issues.” All together, the authors concluded, these new emissions data show that the recently instituted Pennsylvania Department of Environmental Protection’s (PA DEP) methane emissions inventory substantially underestimates facility-level methane emissions. Five unconventional well sites included in this study leaked 10-37 times more methane than estimated in the state inventory.<sup>1000</sup>
- January 25, 2016 – Cornell University scientists introduced an innovative methodology for assessing potential climate impacts of alternative choices and used it to demonstrate that emissions of the two most important greenhouse gases (carbon dioxide and methane), calculated as time-integrated radiative forcing, are lower with heat pump water heaters than any other means of heating water. Further, their calculations showed that

<sup>998</sup> Turner, A. J., Jacob, D. J., Benmergui, J., Wofsy, S. C., Maasakkers, J. D., Butz, A., . . . Biraud, S. C. (2016). A large increase in U.S. methane emissions over the past decade inferred from satellite data and surface observations. *Geophysical Research Letters*, 43. doi: 10.1002/2016GL067987

<sup>999</sup> Magill, B. (2016, February, 16). Study ties U.S. to spike in global methane emissions. *Climate Central*. Retrieved from <http://www.climatecentral.org/news/us-60-percent-of-global-methane-growth-20037>

<sup>1000</sup> Omara, M., Sullivan, M. R., Li, X., Subramanian, R., Robinson, A. L., & Presto, A. A. (2016). Methane emissions from conventional and unconventional natural gas production sites in the Marcellus Shale Basin. *Environmental Science & Technology*, 50. doi: 10.1021/acs.est.5b05503



heat pump water heaters powered by coal-generated electricity achieve greater net climatic benefit than heaters powered by natural gas, while even greater benefits may be achieved by combining heat pump water heaters with electricity generated by renewable sources. The authors proposed and justified a methane emission rate of 3.8 percent for conventional shale gas, which is therefore offered as a lower bound for future, tightly controlled methane emissions from unconventional gas activities. The authors also made their web-based tool for evaluating the greenhouse gas footprint of reference and alternative technologies and its source code available to the public (at <http://www.eeb.cornell.edu/howarth/methane/tool.htm>).<sup>1001</sup>

- December 22, 2015 – To reconcile troubling divergences in published estimates of methane emissions, in which “top-down” estimates, based on atmospheric or satellite sampling, often exceed “bottom-up” estimates, based on ground-level sampling or individual source reports, researchers used a combination of repeated mass balance measurements plus ethane fingerprinting to improve top-down estimates and incorporated a more complete and detailed count of facilities to improve bottom-up estimates.<sup>1002</sup> The results, as demonstrated in the Barnett Shale oil and gas-producing region of Texas, revealed a convergence of estimates to within 10 percent for fossil methane and 0.1 percent for total methane, with predicted methane emissions 90 percent larger than those estimated by the EPA’s Greenhouse Gas Inventory. Exclusion of additional problematic studies might have resulted in even greater convergence and higher estimates.<sup>1003</sup> The agreement between top-down and bottom-up estimates demonstrates that well-designed surveys using either approach can be useful, with spatially resolved bottom-up estimates pointing toward production sites as the source of 53 percent of emissions, compressor stations 31 percent of emissions, and processing plants 13 percent of emissions. The Barnett shale emission rate of 1.5 percent calculated in this study is low enough (less than 3 percent) to suggest that gas fired electricity production in this region causes less climate forcing than coal-fired electricity, but it is high enough (greater than 1 percent) to argue against the conversion of diesel powered freight trucks to compressed natural gas. Gas production practices and heavier activity in other basins may lead to higher emission rates, as may the storage and long-distance or very long-distance transmission of natural gas.
- December 22, 2015 – Writing for *Environment & Energy Publishing*, journalist Gayathri Valdyanathan reported on efforts by climate scientists to convince the United Nations to stop expressing the heat-trapping potential of methane over a 100-year time frame and instead use a twenty-year time frame when generating global warming potential, the conversion factor that allows policymakers to compare methane’s ability to trap heat with that of carbon dioxide. Methane is a far more potent heat-trapping gas than is carbon

<sup>1001</sup> Hong, B., & Howarth, R. W. (2016). Greenhouse gas emissions from domestic hot water: Heat pumps compared to most commonly used systems. *Energy Science & Engineering*, 4(2), 123-133. doi: 10.1002/ese3.112

<sup>1002</sup> Zavala-Araiza, D., Lyon, D. R., Alvarez, R. A., Davis, K. J., Harriss, R. Herndon, S. C., . . . Hamburg, S. P. (2015). Reconciling divergent estimates of oil and gas methane emissions. *Proceedings of the National Academies of Science*, 112(51), 15597-15602. doi: 10.1073/pnas.1522126112

<sup>1003</sup> Song, L. (2015, December 7). Texas fracking zone emits 90% more methane than EPA estimated. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/07122015/methane-emissions-texas-fracking-zone-90-higher-epa-estimate>

dioxide, but it is also shorter lived. By convention, policymakers have used a 100-year time frame when calculating global warming potentials. However, there is no scientific reason to do so, and many scientific critics argue that choosing this time scale veils the true climate impacts of natural gas and “makes the gas appear more benign than it is.”<sup>1004</sup>

- November 25, 2015 – Using reports from countries and companies with proved reserves of recoverable oil, natural gas, and coal, an analysis published in *Global Environmental Change* shows that full production of these resources would use up 160 percent of the world’s estimated remaining carbon budget (designed to restrict anthropogenic climate change to equal to or less than 2° C). While 76 percent of reserves are owned by states or state entities, the relatively smaller amount of reserves owned by investors poses the greater immediate threat, since those companies are more likely poised to produce, refine, and deliver fossil fuels to global markets in the near term. However, exploitation of existing proved reserves controlled by the private sector alone does not lead to warming above the 2° limit, if it is not accompanied by exploration for and development of new reserves. Future considerations of fossil fuel use should focus not only on reducing private sector contributions but also on reducing contributions from countries that have historically dominated or currently dominate emissions, and especially nation-states with large undeveloped reserves.<sup>1005</sup>
- November 9, 2015 – Including data available through 2014, the World Meteorological Organization (WMO) reported that globally averaged levels of carbon dioxide, methane, and nitrous oxide reached new highs in 2014, with values, respectively, “143%, 254% and 121% of pre-industrial (1750) levels.”<sup>1006, 1007</sup> While the atmospheric increase in carbon dioxide has slowed, methane and nitrous oxide levels continue to increase. Measurements from the WMO’s Global Watch Programme point to wetlands in the tropics and anthropogenic sources at mid-latitudes of the northern hemisphere as the sources of increased methane over the past decade.
- October 8, 2015 – As a foundation for policy recommendations, Cornell University biogeochemist Robert Howarth summarized and analyzed the evidence documenting the magnitude of methane emissions related to oil and gas development in the United States since 2007. With estimated emission rates ranging from 3.8-12 percent, the high radiative forcing of methane over a twenty-year period prevents natural gas from serving as a bridge fuel. Instead of further investments in natural gas, Howarth proposes a rapid transition to electric powered vehicles for transportation, high-efficiency heat pumps for space and water heating, and imposition of a methane tax that is roughly 86 times higher

<sup>1004</sup> Vaidyanathan, G. (2015, December 22). Recalculation of leaking methane impacts may affect natural gas market. *E&E Publishing, LLC*. Retrieved from <http://www.eenews.net/stories/1060029873>

<sup>1005</sup> Heede, R., & Oreskes, N. (2015). Potential emissions of CO<sub>2</sub> and methane from proved reserves of fossil fuels: An alternative analysis. *Global Environmental Change*, 36. Advance online publication. Retrieved from <http://dx.doi.org/10.1016/j.gloenvcha.2015.10.005>

<sup>1006</sup> World Meteorological Organization. (2015, November 9). The state of greenhouse gases in the atmosphere based on global observations through 2014. *Greenhouse Gas Bulletin*, 11. Retrieved from [http://scifun.chem.wisc.edu/news/ghg-bulletin\\_2015.pdf?id=8495](http://scifun.chem.wisc.edu/news/ghg-bulletin_2015.pdf?id=8495)

<sup>1007</sup> Miles, T. (2015, November 9). CO<sub>2</sub> levels hit record high for 30th year in a row. *Scientific American*. Retrieved from <https://www.scientificamerican.com/article/co2-levels-hit-record-high-for-30th-year-in-a-row/>

than currently proposed carbon taxes, which typically address only carbon dioxide.<sup>1008</sup> Howarth also noted that the EPA “has seriously underestimated the importance of methane emissions in general—and from shale gas in particular.”<sup>1009</sup>

- August 4, 2015 – A developer of high flow sampling technology determined that a commonly used instrument to quantify methane leakage has unreliable sensors and malfunctions in ways that vastly underreport emissions by factors of three to five. More than 40 percent of the compiled national methane inventory may be affected by this measurement failure, according to the author of this study.<sup>1010</sup> The implications of this discovery for our understanding of system-wide methane leakage rates from drilling and fracking operations are not known, but they do call into question the results of at least one major study of methane emissions that relied on this device for collecting data. This is the second of two studies that finds that the primary tool approved by the EPA for measuring and reporting emissions of methane fails to function properly when used as directed by the manufacturer. (See also entry below dated March 24, 2015.)
- July 21, 2015 – An international team of researchers investigated the claim that the fracking boom, which has dramatically increased supplies of natural gas in the United States, is the main driver of the modest decline in carbon dioxide emissions since 2007. Conventional wisdom, as expressed by the Third National Climate Assessment of the U.S. Global Change Research Program, attributes the drop in emissions to a shift away from carbon dioxide-intensive coal and toward natural gas in power plants. But this team analyzed the sources of change in carbon dioxide emissions and, using a tool called input-output structural decomposition analysis, documented that the economic downturn, not fuel switching in the power sector, was the explanation for declining carbon dioxide emissions since 2007. The single biggest impact on U.S. emissions was changes in the volume of goods and services consumed. Between 2007 and 2013, driven by a huge drop in the volume of capital investment, emissions associated with capital formation decreased by almost 25 percent. During the same period, emissions related to household consumption decreased by 11 percent.<sup>1011</sup>
- July 7, 2015 – A scientific opinion piece by Environmental Defense Fund researchers involved in a group of 11 studies on methane emissions in Texas’ Barnett Shale provided an overview and orientation to new research that either measured or estimated methane emissions from oil and gas operations. Research from both top-down estimates (based on measuring atmospheric methane or related compounds at regional or larger scales) and bottom-up measurements (made directly from components or at ground level near

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<sup>1008</sup> Howarth, R. W. (2015). Methane emissions and climatic warming risk from hydraulic fracturing and shale gas development: implications for policy. *Energy and Emission Control Technologies*, 3, 45-54. doi: <https://dx.doi.org/10.2147/EECT.S61539>

<sup>1009</sup> Hauser, A. (2015, October 21). Two studies highlight risks of fracking-released methane. *Weather.com*. Retrieved from <https://weather.com/science/environment/news/studies-highlight-risks-of-methane-from-fracking>

<sup>1010</sup> Howard, T. (2015). University of Texas study underestimates national methane emissions at natural gas production sites due to instrument sensor failure. *Energy Science & Engineering*. Advance online publication. doi: 10.1002/ese3.81

<sup>1011</sup> Feng, K., Davis, S. J., Sun, L., & Hubacek, K. (2015). Drivers of the US CO<sub>2</sub> emissions 1997-2013. *Nature Communications*, 6. doi: 10.1038/ncomms8714

studied sites) demonstrated that methane emissions from oil and gas operations in the Barnett Shale region exceeded the emissions expected from the EPA's greenhouse gas inventory, which relies on industry self-reporting and excludes many compressor stations. The new research detailed the importance of addressing high-emitting landfills and natural gas facilities ("super-emitters") and malfunctioning equipment in efforts to control ongoing methane emissions.<sup>1012</sup>

- May 28, 2015 – A comprehensive working paper from the New Climate Economy initiative of the Global Commission on the Economy and Climate at Stockholm Environment Institute found that the experience in the United States of substituting natural gas for oil was unlikely to be replicated around the globe and probably will not provide climate benefits unless coupled with strict controls on methane leakage, limits on total energy use, and policies to prevent the displacement of non-fossil fuel energy by methane. Citing multiple studies of the net climate impact of "more abundant, cheaper natural gas supplies," the Commission concluded that "both globally and for the United States, the increase in emissions from the scale effect [from increased energy consumption boosted by cheap natural gas and loss of potentially more expensive lower carbon approaches] fully offsets the emission benefits from the substitution effect, net of methane leakage."<sup>1013, 1014</sup>
- March 24, 2015 – A University of Cincinnati researcher and independent engineers documented that the Bacharach Hi-Flow Sampler (BHFS)—one of the only tools approved by the EPA for measuring and reporting emissions of methane from natural gas transmission, storage, and processing facilities—failed to function properly when used as indicated by the manufacturer. The BHFS, unless recalibrated daily and running revised software (or taking measurements in a nearly pure methane environment, which is exceedingly rare in the field), misreported high levels of natural gas by as much as an order of magnitude lower than actual concentration. A reanalysis of 2011 results from the City of Fort Worth Air Quality Study revealed at least seven instances for which the BHFS indicated sample concentrations at or below 5 percent when more reliable canister methane readings indicated concentrations that ranged from 6.1 percent to 90.4 percent. Inaccurate measurements like these can contribute to the discrepancy between "top-down" and "bottom-up" measurements of methane, with ground-level measurements from the BHFS potentially producing reports of falsely low emissions.<sup>1015</sup> This study was followed by another that further documented malfunctions in the BHFS device and called

<sup>1012</sup> Harriss, R., Alvarez, R.A., Lyon, D., Zavala-Araiza, D., Nelson, D., & Hamburg, S.P. (2015). Using multi-scale measurements to improve methane emission estimates from oil and gas operations in the Barnett Shale Region, Texas. *Environmental Science & Technology*, 49, 7524-7526. doi: 10.1021/acs.est.5b02305

<sup>1013</sup> Lazarus, M., Tempest, K., Klevnäs, P., & Korsbakken, J. I. (2015) Natural gas: Guardrails for a potential climate bridge. Stockholm Environment Institute. Retrieved from <http://www.sei-international.org/mediamanager/documents/Publications/Climate/NCE-SEI-2015-Natural-gas-guardrails-climate-bridge.pdf>

<sup>1014</sup> Evans, S. (2015, June 2). The climate benefits of a gas bridge are unlikely to be significant. *Climate Spectator*. Retrieved from <http://www.businessspectator.com.au/article/2015/6/2/policy-politics/climate-benefits-gas-bridge-are-unlikely-be-significant>

<sup>1015</sup> Howard, T., Ferrara, T., & Townsend-Small, A. (2015). Sensor transition failure in the high flow sampler: Implications for methane emission inventories of natural gas infrastructure. *Journal of the Air & Waste Management Association*, 65(7), 856-862. doi: 10.1080/10962247.2015.1025925

into question the results of a landmark 2013 survey of methane emissions at 190 drilling and fracking sites across the United States. That 2013 survey, from the University of Texas, relied on the BHFS device for collecting data and found very low leakage rates.<sup>1016</sup> (See also entry above dated August 4, 2015.)

- March 20, 2015 – A team led by Bruno Franco from the University of Liege in Belgium discovered an abrupt uptick in ethane levels at a mountaintop station in the Swiss Alps that is far removed from local pollution sources.<sup>1017</sup> In a later comment about this discovery, Franco said, “Since 2009, we observed increases of 5% per year here—it was completely unexpected.”<sup>1018</sup> The team attributed the trend reversal to the natural gas boom in North America. Ethane is released together with methane from drilling and fracking operations and serves as a proxy for it. (See also the entry above for April 7, 2016.)
- March 9, 2015 – With specialized equipment in a mobile van, University of Colorado, NOAA, Environmental Defense Fund, and independent researchers continuously measured methane and ethane from public roads at sites downwind of potential emission sources, such as natural gas production wellheads, processing plants, and compressor stations. The sampling method and modeling allowed capture of multiple “accidental” plumes, acquired during long drives across the study region between planned measurements near large facilities. Sampling was not random but documented a large number of facilities with low methane emission rates (equal to or less than 10 kg/hr), with a smaller yet important number of facilities showing much higher emissions. Although the largest measured emission in this study (1,360 kg/hr) corresponded to approximately \$1.2 million in lost revenue per year, the authors noted that, in this industry, the “leak fraction” or “proportional loss” levels they documented would generally translate into only a small proportion of lost revenue, probably not sufficient to prompt strong energy-sector self-regulation.<sup>1019</sup>
- March 1, 2015 – Using a simulation model, the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety, writing for Germany’s Federal Environmental Agency, found that shale gas was not a cheap option to reduce global greenhouse gas emissions. Multiple comparison simulations found that shale gas availability, especially in the short-term, tends to lead to higher emissions due to lower energy prices inducing higher use. The net result is higher costs to achieve compliance

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<sup>1016</sup> Allen, D. T., Torres, V. M., Thomas, J., Sullivan, D.W., Harrison, M., Hendler, A., . . . Seinfeld, J. H. (2013). Measurements of methane emissions at natural gas production sites in the United States. *Proceedings of the National Academy of Sciences*, 110, 17768–17773. doi: 10.1073/pnas.1304880110

<sup>1017</sup> Franco, B., Bader, W., Toon, G. C., Bray, C., Perrin, A., Fischer, E. V., . . . Mahieu, E. (2015). Retrieval of ethane from ground-based FTIR solar spectra using improved spectroscopy: recent burden increase above Jungfraujoch. *Journal of Quantitative Spectroscopy and Radiative Transfer*, 160, 36–49. <http://dx.doi.org/10.1016/j.jqsrt.2015.03.017>

<sup>1018</sup> Environmental Research Web. (2016, May 23). Ethane emissions back on the rise. Retrieved from <http://environmentalresearchweb.org/cws/article/news/65093>

<sup>1019</sup> Yacovitch, T. I., Herndon, S. C., Pétron, G., Kofler, J., Lyon, D., Zahniser, M. S., & Kolb, C. E. (2015). Mobile laboratory observations of methane emissions in the Barnett Shale Region. *Environmental Science & Technology*, 49, 7889–7895. doi: 10.1021/es506352j

with climate targets. In this model, shale gas was also found to compete in an unhelpful way with renewable energy sources, resulting in reduced use of renewable energy sources and reduced investment in energy efficiency measures.<sup>1020</sup>

- January 8, 2015 – Using a single integrated modeling program that incorporates detailed estimates of the world’s reserves of oil, gas, and coal and is consistent with a wide variety of prior modeling approaches, University College London researchers demonstrated that, around the world, “a third of oil reserves, half of gas reserves and over 80 per cent of current coal reserves should remain unused from 2010 to 2050” in order to meet a target of less than or equal to a 2 degree Celsius rise in global temperature. In addition, “development of resources in the Arctic and any increase in unconventional oil production are incommensurate with efforts to limit average global warming” below the 2 degree threshold. Calling for a “stark transformation” of our understanding of fossil fuel availability, the authors noted that, in a climate-constrained world, fears of scarcity of fossil fuels must be superseded by a commitment to preventing overuse of existing resources and reserves.<sup>1021</sup>
- November 26, 2014 – Stanford University and independent researchers compared coal and natural gas for power generation and concluded that the question of “whether natural gas plants are better than coal plants cannot be answered in the general case.” During the period of plant operation, “natural gas plants can produce greater near-term warming than coal plants, with the same power output.” They found that over time, natural gas plants can produce some reduction in near-term warming, but only if life cycle methane leakage rates are low and power plant efficiency is high. Relative to coal, there is the potential that “deployment of natural gas power plants could both produce excess near-term warming (if methane leakage rates are high) and produce excess long-term warming (if the deployment of natural gas plants today delays the transition to near-zero emission technologies).”<sup>1022</sup>
- October 23, 2014 – Adding to the debate about natural gas and climate change, a multi-center, international research team used a sophisticated, integrated approach to the global energy-economy-climate systems question and found no climate benefit to natural gas over other fossil fuels. As summarized by the editor of *Nature*,

The development of hydraulic fracturing technologies has led to rapid growth in the use of natural gas as an energy source. Some evidence has suggested that this growing adoption of natural gas might lead a reduced greenhouse gas burden and consequent mitigation of climate change. This collaboration between five energy–

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<sup>1020</sup> Kersting, J., Duscha, V., Schleich, J., & Keramidas, K. (2015). The impact of shale gas on the costs of climate policy. Environmental Research of the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety. Retrieved from [https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/climate\\_change\\_03\\_2015\\_the\\_impact\\_of\\_shale\\_gas\\_1.pdf](https://www.umweltbundesamt.de/sites/default/files/medien/378/publikationen/climate_change_03_2015_the_impact_of_shale_gas_1.pdf)

<sup>1021</sup> McGlade, C., & Ekins, P. (2015). The geographical distribution of fossil fuels unused when limiting global warming to 2°C. *Nature*, 517, 187-190. doi: 10.1038/nature14016

<sup>1022</sup> Zhang, X., Myhrvold, N. P., & Caldeira, K. (2014). Key factors for assessing climate benefits of natural gas versus coal electricity generation. *Environmental Research Letters*, 9. doi: 10.1088/1748-9326/9/11/114022

climate modelling teams show that instead—under a scenario of abundant natural gas availability—increased consumption will have little or no impact on climate change.” The authors concluded, “although market penetration of globally abundant gas may substantially change the future energy system, it is not necessarily an effective substitute for climate change mitigation policy.”<sup>1023</sup>

- October 6, 2014 – Utilizing satellite data for the Bakken and Eagle Ford formations, scientists from Germany, the United Kingdom, and the University of Maryland confirmed that higher “top-down” estimates of fugitive methane leaks from oil and gas fields (which are obtained via tall tower flask samples, aircraft measurements, and road surveys) are more accurate than lower “bottom-up” estimates (which are obtained by summing emissions from different types of known sources at sites provided by participating utility companies). According to “bottom-up” estimates, the average U.S. leakage rate ranges from 1.2-2.0 percent. But satellite data show much higher leakage rates: 10.1 percent ( $\pm 7.3$  percent) and 9.1 percent ( $\pm 6.2$  percent), for the Bakken and Eagle Ford formations, respectively. These higher estimates indicate that current inventories likely underestimate fugitive emissions and call into question any immediate climate benefit from switching from coal to natural gas. Similar results were seen for the Marcellus shale region, but as a result of technical and geographical limitations, the authors declined to quantify their results, pending future studies with enhanced equipment.<sup>1024</sup>
- September 24, 2014 – According to a paper published by scientists from the University of California and Stanford University, “... without strong limits on [greenhouse gas] emissions or policies that explicitly encourage renewable electricity, abundant natural gas may actually slow the process of decarbonization, primarily by delaying deployment of renewable energy technologies.” The study builds on previous research by examining natural gas in a range of supply curves, with a tested economic model, and across three different types and levels of climate policy. Researchers found that abundant natural gas, even with low rates of methane leakage, does little to reduce—and may increase—greenhouse gases. They conclude that delaying deployment of renewable energy technologies “may actually exacerbate the climate change problem in the long term.”<sup>1025</sup>
- September 2, 2014 – Analyzing the level of greenhouse gas emissions attributable to electricity from natural-gas-fired power plants and coal-fired power plants, economist Chris Busch and physicist Eric Gimon conclude that, over short time frames and at high rates of leakage, natural gas offers little benefit compared to coal and could exacerbate global warming. Although Busch and Gimon acknowledge that natural gas offers some reductions in greenhouse gas emissions over longer time frames, they point out that such

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<sup>1023</sup> McJeon, H., Edmonds, J., Bauer, N., Clarke, L., Fisher, B., Flannery, B., . . . Tavoni, M. (2013). Limited impact on decadal-scale climate change from increased use of natural gas. *Nature*, 514, 482–485. doi: 10.1038/nature13837

<sup>1024</sup> Schneising, O., Burrows, J. P., Dickerson, R. R., Buchwitz, M., Reuter, M., & Bovensmann, H. (2014). Remote sensing of fugitive methane emissions from oil and gas production in North American tight geologic formations. *Earth's Future*, 2(10), 548–558. doi: 10.1002/2014EF000265

<sup>1025</sup> Shearer, C., Bistline, J., Inman, M., & Davis, S. J. (2014). The effect of natural gas supply on US renewable energy and CO<sub>2</sub> emissions. *Environmental Research Letters*, 9. doi: 10.1088/1748-9326/9/9/094008

reductions are not large enough for natural gas to play an expanded role in efforts to manage emissions. They conclude that under the best of circumstances, natural gas-fired electric power offers a modest benefit toward abating climate change, while if poorly developed (i.e., with extensive methane leaks, estimated by these authors to be on the order of 4 percent or higher), or if used to displace energy efficiency or renewable energy, natural gas could seriously contribute to increased greenhouse gas emissions.<sup>1026</sup>

- August 5, 2014 – Reporting in *Scientific American*, the science news organization Climate Central outlined the natural gas-related factors that threaten any ability to achieve climate goals through the proposed Clean Power Plan. “No one has any idea how much methane is leaking from our sprawling and growing natural gas system. This is a major problem, because without a precise understanding of the leak rate natural gas could actually make climate change worse.” Referring to an interactive Climate Central tool that runs various methane leakage scenarios, the article notes that, even given modest leak rates and an aggressive transition, “we could still end up with little or no climate benefits by 2030 after an enormous financial and political investment in natural gas.”<sup>1027</sup>
- July 25, 2014 –EPA’s Office of Inspector General reports that the agency “has placed little focus and attention on reducing methane emissions from pipelines in the natural gas distribution sector.” According to this report, the EPA acknowledged in 2012 that leaks from natural gas pipelines “accounted for more than 13 million metric tons of carbon dioxide equivalent emissions,” are almost 100 percent methane, and represent more than 10 percent of total methane emissions from natural gas systems in the United States. Nevertheless, as report went on to note, the EPA does not have the partnerships in place to begin controlling methane leaks, such as with the Pipeline and Hazardous Materials Safety Administration, nor has it conducted a comprehensive analysis of emissions factors, relying instead on a 1996 study with a “high level of uncertainty.”<sup>1028</sup>
- May 15, 2014 – A recent review of existing data on life cycle emissions of methane from natural gas systems concluded that, as a strategy for addressing climate change, natural gas is a “bridge to nowhere.” The review found that, over a 20-year time frame, natural gas is as bad as or worse than coal and oil as a driver of climate change.<sup>1029</sup> Referencing this review and other recent studies, *Bloomberg Business News* reported that the EPA has underestimated the impact of methane leakage resulting from the production, transmission, and distribution of natural gas and is using outdated estimates of methane’s

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<sup>1026</sup> Busch, C. & Gimon, E. (2014). Natural gas versus coal: Is natural gas better for the climate. *The Electricity Journal*, 27(7), 97-111.

<sup>1027</sup> Climate Central. (2014, August 5). Methane leak rate proves key to climate change goals. *Scientific American*. Retrieved from <http://www.scientificamerican.com/article/methane-leak-rate-proves-key-to-climate-change-goals/>

<sup>1028</sup> U.S. Environmental Protection Agency Office of Inspector General. (2014, July 25). *Improvements needed in EPA efforts to address methane emissions from natural gas distribution pipelines*. Report No. 14-P-0324. Retrieved from <http://www.epa.gov/oig/reports/2014/20140725-14-P-0324.pdf>

<sup>1029</sup> Howarth, R. W. (2014). A bridge to nowhere: Methane emissions and the greenhouse gas footprint of natural gas [Abstract]. *Energy Science & Engineering*. doi: 10.1002/ese3.35



potency compared to more recent estimates from the Intergovernmental Panel on Climate Change (IPCC).<sup>1030</sup>

- April 25, 2014 – A reassessment of the heat-trapping potential of greenhouse gases revealed that current methods of accounting underestimate the climate-damaging impact of methane pollution from all sources, including drilling and fracking operations.<sup>1031</sup>
- April 14, 2014 – A study from researchers at Purdue University, NOAA, Cornell University, University of Colorado at Boulder, and Pennsylvania State University, published in *Proceedings of the National Academy of Sciences* found very high levels of methane emissions above many wells being drilled at fracking sites in Pennsylvania. Levels were 100-1,000 times above the estimates of federal regulators, who have always assumed very low methane emissions as wells are drilled.<sup>1032, 1033</sup>
- February 26, 2014 – The United Nations’ top environmental official, Achim Steiner, argued that the shale gas rush is “a liability” in efforts to slow climate change and that a switch from coal to natural gas is delaying critical energy transition to renewables.<sup>1034</sup>
- February 13, 2014 – A major study in *Science* by Stanford University, Massachusetts Institute of Technology, and the U.S. Department of Energy found that methane leaks negate any climate benefits of natural gas as a fuel for vehicles, and that the EPA is significantly underestimating methane in the atmosphere.<sup>1035</sup> Lead author Adam R. Brandt told the *New York Times*, “Switching from diesel to natural gas, that’s not a good policy from a climate perspective.”<sup>1036</sup> This study also concluded that the national methane leakage rate is likely between 3.6 and 7.2 percent of production.

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<sup>1030</sup> Childers, A. (2014, May 9). EPA underestimates fracking's impact on climate change. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2014-05-09/epa-underestimates-fracking-s-impact-on-climate-change.html>

<sup>1031</sup> Edwards, M. R., & Trancik, J. E. (2014). Climate impacts of energy technologies depend on emissions timing. *Nature Climate Change*, 4, 348-352. doi: 10.1038/NCLIMATE2204

<sup>1032</sup> Caulton, D. R., Shepson, P. B., Santoro, R. L., Sparks, J. P., Howarth, R. W., Ingraffea, A. R., . . . Miller, B. R. (2014). Toward a better understanding and quantification of methane emissions from shale gas development.

*Proceedings of the National Academy of Sciences of the United States of America*. doi: 10.1073/pnas.1316546111

<sup>1033</sup> Banjeree, N. (2014, April 14). EPA drastically underestimates methane released at drilling sites. *Los Angeles Times*. Retrieved from <http://www.latimes.com/science/sciencenow/la-sci-sn-methane-emissions-natural-gas-fracking-20140414,0,2417418.story>

<sup>1034</sup> Goldenberg, S. (2014, February 26). Achim Steiner: Shale gas rush “a liability” in efforts slow climate change. *Guardian*. Retrieved from <http://www.theguardian.com/environment/2014/feb/26/achim-steiner-shale-gas-rush-climate-change-energy>

<sup>1035</sup> Brandt, A. R., Heath, G. A., Kort, E. A., O'Sullivan, F., Petron, G., Jordaan, S. M., . . . Harriss, R. (2014). Methane leaks from North American natural gas systems. *Energy and Environment*, 343(6172), 733-735. doi: 10.1126/science.1247045

<sup>1036</sup> Davenport, C. (2014, February 13). Study finds methane leaks negate benefits of natural gas as a fuel for vehicles. *The New York Times*. Retrieved from <http://www.nytimes.com/2014/02/14/us/study-finds-methane-leaks-negate-climate-benefits-of-natural-gas.html?smid=tw-share>

- January 15, 2014 – As reported by the *Guardian*, a new study by BP concluded that shale gas “...will not cause a decline in greenhouse gases” and will do little to cut carbon emissions.<sup>1037</sup>
- December 30, 2013 – An analysis of fracking-related truck transportation in the Susquehanna River Basin in Pennsylvania found that greenhouse gas emissions from frack water and waste hauling operations were 70-157 metric tons of CO<sub>2</sub> equivalent per gas well.<sup>1038</sup>
- November 11, 2013 – In a letter to California Governor Jerry Brown, twenty of the nation’s top climate scientists warned that pro-fracking policies will worsen climate disruption and harm California’s efforts to be a leader in reducing greenhouse gas emissions. The letter called on Governor Brown to place a moratorium on fracking.<sup>1039</sup> On November 21, 2013, a group of Governor Brown’s former policy and campaign advisors made a similar request in light of concerns about the effects of fracking on climate change and water pollution.<sup>1040</sup>
- October 18, 2013 – A team of researchers from multiple institutions including Harvard, the University of Michigan, and NOAA reported that methane emissions due to drilling activities in the south-central U.S. may be almost five times greater than reported by the world’s most comprehensive methane inventory. “These results cast doubt on the US EPA’s recent decision to downscale its estimate of national natural gas emissions by 25-30 percent,” the authors wrote.<sup>1041</sup> As the *New York Times* reported, “The analysis also said that methane discharges in Texas and Oklahoma, where oil and gas production was concentrated at the time, were 2.7 times greater than conventional estimates. Emissions from oil and gas activity alone could be five times greater than the prevailing estimate.”<sup>1042</sup>
- October 18, 2013 – A major study spearheaded by Stanford University’s Energy Modeling Forum concluded that fracking and the shale gas revolution will have no long-

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<sup>1037</sup> Harvey, F., & Macalister, T. (2014, January 16). BP study predicts greenhouse emissions will rise by almost a third in 20 years. *The Guardian*. Retrieved from [http://www.theguardian.com/business/2014/jan/15/bp-predicts-greenhouse-emissions-rise-third?CMP=tw\\_t\\_gu](http://www.theguardian.com/business/2014/jan/15/bp-predicts-greenhouse-emissions-rise-third?CMP=tw_t_gu)

<sup>1038</sup> Gilmore, K. R., Hupp, R. L., & Glathar, J. (2014). Transport of Hydraulic Fracturing Water and Wastes in the Susquehanna River Basin, Pennsylvania. *Journal of Environmental Engineering*, 140. doi: 10.1061/(ASCE)EE.1943-7870.0000810

<sup>1039</sup> Rogers, P. (2013, November 12). Top climate scientists call for fracking ban in letter to Gov. Jerry Brown. *San Jose Mercury News*. Retrieved from [http://www.mercurynews.com/ci\\_24509392/top-climate-scientists-call-fracking-ban-letter-gov](http://www.mercurynews.com/ci_24509392/top-climate-scientists-call-fracking-ban-letter-gov)

<sup>1040</sup> McNary, S. (2013, November 21). Former advisors to Gov. Brown request fracking ban. *Southern California Public Radio*. Retrieved from <http://www.scpr.org/blogs/politics/2013/11/21/15248/former-advisors-to-gov-brown-request-fracking-ban/>

<sup>1041</sup> Miller, S. M., Wofsy, S. C., Michalak, A. M., Kort, E. A., Andrews, A. E., Biraud, S. C., . . . Sweeney, C. (2013). Anthropogenic emissions of methane in the United States. *Proceedings of the National Academy of Sciences*, 110(50), 20018-20022. doi: 10.1073/pnas.1314392110

<sup>1042</sup> Wines, M. (2013, November 25). Emissions of methane in U.S. exceed estimates, study finds. *The New York Times*. Retrieved from [http://www.nytimes.com/2013/11/26/us/emissions-of-methane-in-us-exceed-estimates-study-finds.html?\\_r=0](http://www.nytimes.com/2013/11/26/us/emissions-of-methane-in-us-exceed-estimates-study-finds.html?_r=0)

term climate benefit. The study brought together a working group of about 50 experts and advisors from companies, government agencies, and universities, and modeling teams from 14 organizations. The study also found that build-out of infrastructure for fracking and natural gas will discourage efforts to conserve energy and boost efficiency. The study did not examine methane leaks in order to weigh in on the short-term climate impacts of natural gas.<sup>1043</sup>

- October 11, 2013 – As reported in the *Guardian*, key climate scientists argued that the growth in fracking across the United States is hurting the United States’ credibility on climate change.<sup>1044</sup>
- October 2, 2013 – Updated measurements from the IPCC determined that methane is even worse for the climate than previously thought. The IPCC determined that methane is 34 times more potent as a greenhouse gas in the atmosphere than CO<sub>2</sub> over a 100-year timeframe, and 86 times more potent over a 20-year timeframe.<sup>1045</sup>
- September 27, 2013 – The IPCC formally embraced an upper limit on greenhouse gases for the first time, warning that the world will exceed those levels and face irreversible climatic changes in a matter of decades unless steps are taken soon to reduce emissions. The IPCC reported that humanity faces a “carbon budget”—a limit on the amount of greenhouse gases that can be produced by industrial activity before irreversible, damaging consequences—of burning about a trillion metric tons of carbon. The world is on track to hit that by around 2040 at the current rate of energy consumption.<sup>1046</sup>
- August 12, 2013 – A *New Scientist* review of the science on fracking and global warming concluded that fracking could accelerate climate change rather than slow it.<sup>1047</sup>
- May 28, 2013 – A research team led by Jeff Peischl, an associate scientist at NOAA and the Cooperative Institute for Research in Environmental Sciences, estimated that methane leakage from Los Angeles-area oil and gas operations was about 17 percent.<sup>1048, 1049</sup>

<sup>1043</sup> Huntington, H. (2013). Changing the game? Emissions and market implications of new natural gas supplies. *Energy Modeling Forum, 1*. Retrieved from <https://emf.stanford.edu/publications/emf-26-changing-game-emissions-and-market-implications-new-natural-gas-supplies>

<sup>1044</sup> Magill, B. (2013, October 11). Fracking hurts US climate change credibility, say scientists. *Guardian*. Retrieved from <http://www.theguardian.com/environment/2013/oct/11/fracking-us-climate-credibility-shale-gas>

<sup>1045</sup> IPCC. (2013). *Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* [Stocker, T. F., D. Qin, G.-K. Plattner, M. Tignor, S. K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex & P. M. Midgley (eds.)]. Cambridge, United Kingdom and New York, NY, USA: Cambridge University Press. doi: 10.1017/CBO9781107415324.

<sup>1046</sup> Gillis, J. (2013, September 27). U.N. climate panel endorses ceiling on global emissions. *The New York Times*. Retrieved from <http://www.nytimes.com/2013/09/28/science/global-climate-change-report.html?pagewanted=all>

<sup>1047</sup> Pearce, F. (2013, August 12). Fracking could accelerate global warming. *New Scientist*. Retrieved from <http://www.newscientist.com/article/dn24029-fracking-could-accelerate-global-warming.html#.UpEWqsQ3uSo>

<sup>1048</sup> Peischl, J., Ryerson, T. B., Brioude, J., Aikin, K. C., Andrews, A. E., Atlas, E., . . . Parrish, D. D. (2013). Quantifying sources of methane using light alkanes in the Los Angeles basin, California. *Journal of Geophysical Research: Atmospheres, 118*(10), 4974-4990. doi: 10.1002/jgrd.50413

<sup>1049</sup> Ogburn, S. (2014, May 15). Solving the Case of California's Extra Methane. *Scientific American Global RSS*. Retrieved from <http://www.scientificamerican.com/article/solving-the-case-of-californias-extra-machine/>

- May 2013 – A group of scientists and journalists studying climate change, led by energy systems analyst Eric Larson of Princeton University and the news organization Climate Central, reported that the often-purported 50 percent climate advantage of natural gas over coal is unlikely to be achieved over the next three to four decades given methane leaks and other factors.<sup>1050</sup> The 50 percent claim is based on the fact that natural gas produces half as much carbon dioxide when burned than coal, but it ignores the significant greenhouse gas impacts of methane leakage that occurs throughout the life cycle of natural gas production, transmission, and distribution.
- January 2, 2013 – A NOAA study found methane emissions from oil and gas fields in Utah to be as high as nine percent of production. These levels are considered extremely damaging to the climate.<sup>1051</sup>
- November 2012 – A review by the United Nations Environment Programme found that emissions from fracking, as well as other unconventional natural gas extraction methods, could increase global warming in the short-term and be comparable to coal over a 100-year timeframe.<sup>1052</sup>
- November 2012 – The International Energy Agency (IEA) found that a large natural gas boom—even with improvements in place to reduce leakage—would eventually lead to greenhouse gas concentrations of 650 parts per million and a global temperature rise of 3.5 degrees Celsius, far exceeding the 2 degree Celsius limit which is critical to avoid the most severe effects of climate change.<sup>1053</sup>
- May 29, 2012 – The *Guardian* summarized a special report on natural gas by the IEA: “A ‘golden age of gas’ spurred by a tripling of shale gas from fracking and other sources of unconventional gas by 2035 will stop renewable energy in its tracks if governments do not take action.”<sup>1054</sup>
- February 2012 – A study published in *Environmental Research Letters* found that the carbon dioxide emitted from the burning of natural gas—even neglecting the impacts of methane leakage—contributes significantly to greenhouse gas emissions that are driving climate change.<sup>1055</sup>

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<sup>1050</sup> Larson, E. D. (2013). Natural gas & climate change. *Climate Central*. Retrieved from <http://assets.climatecentral.org/pdfs/NaturalGas-and-ClimateChange.pdf>

<sup>1051</sup> Tollefson, J. (2013). Methane leaks erode green credentials of natural gas. *Nature*, 493(7430), 12. doi: 10.1038/493012a

<sup>1052</sup> Global Environmental Alert Service. (2012). Gas fracking: Can we safely squeeze the rocks? United Nations Environment Programme. Retrieved from [http://www.unep.org/pdf/UNEP-GEAS\\_NOV\\_2012.pdf](http://www.unep.org/pdf/UNEP-GEAS_NOV_2012.pdf)

<sup>1053</sup> World Energy Outlook 2012, (November 2012). *Golden Rules for a Golden Age of Natural Gas—World Energy Outlook Special Report on Unconventional Gas*, International Energy Agency. Retrieved from <http://www.iea.org/publications/freepublications/publication/name,27408,en.html>

<sup>1054</sup> Harvey, F. (2012, May 29). 'Golden age of gas' threatens renewable energy, IEA warns. *Guardian*. Retrieved from <http://www.theguardian.com/environment/2012/may/29/gas-boom-renewables-agency-warns>

<sup>1055</sup> Myhrvold, N. P., & Caldeira, K. (2012). Greenhouse gases, climate change and the transition from coal to low-carbon electricity. *Environmental Research Letters*, 7(1). doi: 10.1088/1748-9326/7/1/014019

- February 7, 2012 – A NOAA study of Colorado gas fields measured methane emissions of about four percent, a significant percentage that could be very damaging to the climate.<sup>1056</sup>
- December 29, 2011 – As reported by the *New York Times*, levels of methane in the atmosphere have been steadily rising since 2007—coinciding with the onset of the fracking boom and posing a serious threat to the Earth’s climate.<sup>1057</sup>
- October 2011 – A study from the National Center for Atmospheric Research concluded that substituting the use of natural gas for coal will increase, rather than decrease, the rate of global warming for many decades.<sup>1058</sup>
- July 6, 2011 – According to the U.S. Energy Information Administration and other research, significant amounts of methane are leaking from aging gas pipelines and infrastructure.<sup>1059</sup>
- April 2011 – A comprehensive analysis of the greenhouse gas footprint of natural gas from shale formations found that between 3.6 percent to 7.9 percent of the methane from natural gas production wells escapes into the atmosphere, rather than being combusted, thereby undermining any climate benefits of gas over coal as a source of energy.<sup>1060, 1061</sup>

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<sup>1056</sup> Tollefson, J. (2012, February 7). Air sampling reveals high emissions from gas field. *Nature*. Retrieved from <http://www.nature.com/news/air-sampling-reveals-high-emissions-from-gas-field-1.9982>

<sup>1057</sup> Gillis, J. (2011, December 29). The puzzle of rising methane. *The New York Times*. Retrieved from <http://green.blogs.nytimes.com/2011/12/29/the-puzzle-of-rising-methane/>

<sup>1058</sup> Wigley, T. M. (2011). Coal to gas: The influence of methane leakage. *Climatic Change*, 108(3), 601-608. doi: 10.1007/s10584-011-0217-3

<sup>1059</sup> McKenna, P. (2011, July 6). Thousands of gas leaks under Boston and San Francisco. *New Scientist*. Retrieved from <http://www.newscientist.com/article/mg21128203.800-thousands-of-gas-leaks-under-boston-and-san-francisco.html#.UpEbbMQ3uSp>

<sup>1060</sup> Howarth, R. W., Santoro, R., & Ingraffea, A. (2011). Methane and the greenhouse-gas footprint of natural gas from shale formations. *Climatic Change*, 106(4), 679-690. doi: 10.1007/s10584-011-0061-5

<sup>1061</sup> Howarth, R. W., Santoro, R., & Ingraffea, A. (2012). Venting and leaking of methane from shale gas development: Response to Cathles et al. *Climatic Change*, 113(2), 537-549. doi: 10.1007/s10584-012-0401-0

## Threats from fracking infrastructure

*The infrastructure for drilling and fracking operations is complex, widespread, and poses its own risks to public health and the climate. Beginning where silica sand is mined and processed and ending where gas is burned or liquefied for export, infrastructure includes pipelines, compressor stations, dehydrators, processing plants, flare stacks, gas-fired power plants, and storage depots through which oil or gas is moved, filtered, pressurized, warehoused, refined, and vented. It also includes injection wells and recycling facilities that dispose and treat the prodigious amounts of liquid waste that fracking generates. Air pollution is produced at every stage of the process. [Note: harm from flare stacks is included in Air Pollution and is not taken up in the sub-sections that follow.]*

### Sand mining and processing

*In the Upper Midwest, the boom in silica sand mining threatens both air and water quality. It has transformed rural areas into industrialized zones and introduced complex public health risks that are not well understood. Silica dust is a well-known cause of both lung cancer and silicosis. Precise exposures to downwind communities remain uncertain. Until recently, the center of frack sand mining was western Wisconsin. However, sand mines in the Permian Basin of west Texas now provide one quarter of the total U.S. supply of frack sand. Texas sand is considered inferior to Wisconsin sand, which is crush-resistant and ideally shaped to prop open fractures to allow oil and gas to flow up the borehole. However, Texas sand is up to 50 percent cheaper as it does not incur the cost of rail transport to reach the booming Permian Basin oil wells.*

- March 7, 2019 – The Minnesota Supreme Court announced that it would hear oral arguments on the legality of Winona County’s ban on the mining of silica sand for use in fracking operations. A Winona County judge, as well as a Minnesota Court of Appeals, sided against Minnesota Sands, LLC and ruled in favor of the county legislature.<sup>1062</sup> The ban prohibits mining sand for industrial purposes but allows mining for construction purposes. The county has argued that it is within its rights to protect the health of its citizens. Its original ordinance, passed on November 22, 2016, was the first countywide ban in the nation on the extraction of silica sand for use in drilling and fracking operations. It became the subject of a lawsuit by Minnesota Sands on the grounds that the ordinance violates the federal Commerce Clause of the U.S. Constitution.<sup>1063, 1064</sup>

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<sup>1062</sup> Winona Daily News Staff, & Associated Press. (2019, March 7). Challenge to Winona County’s frac sand ban to be heard by state Supreme Court next month. *Winona Daily News*. Retrieved from [https://www.winonadailynews.com/news/local/challenge-to-winona-county-s-frac-sand-ban-to-be/article\\_bd2474ea-e6a7-5f9f-8108-c957de307aad.html](https://www.winonadailynews.com/news/local/challenge-to-winona-county-s-frac-sand-ban-to-be/article_bd2474ea-e6a7-5f9f-8108-c957de307aad.html)

<sup>1063</sup> Rogers, C. (2018, October 31). Supreme Court takes frac sand case. *Winona Post*. Retrieved from <http://www.winonapost.com/Article/ArticleID/61409/Supreme-Court-takes-frac-sand-case>

<sup>1064</sup> Browning, D. (2018, July 30). Appeals court upholds Winona County ban on frac sand mining. *Star-Tribune*. Retrieved from <http://www.startribune.com/minnesota-appeals-court-upholds-winona-county-ban-on-frac-sand-mining/489529801/>

- December 27, 2018 – Wisconsin’s frack sand mining industry had a volatile year in 2018. Mines that had closed in 2016 due to market downturns reopened on news of increased drilling activity. However, later in the year, the price for sand dropped dramatically as sand mines opened in Texas to serve fracking operations in the nearby Permian Basin. Wisconsin sand companies then closed mines again, with one company laying off 37 employees.<sup>1065</sup>
- July 17, 2018 – As part of an industry-funded study, a research team retrospectively assessed the silica dust exposure among workers in the industrial sand industry, which includes sand used for fracking. Workers who went on to develop silicosis had significantly more exposure to silica dust than those who did not. Results showed decreases in exposure throughout the industry over time, driven in part by the establishment of workplace regulations in the 1970s that helped accelerate silica dust control programs. Adjustment for use of respiratory protection showed only modest reductions in estimated exposures.<sup>1066</sup>
- May 11, 2018 – The dunes sagebrush lizard in western Texas is imperiled because of booming demand for frack sand. “It’s really a new threat and it just sort of came in all at once and really has the potential to wipe out a lot of lizard habitat, if not controlled,” said a petition to the U.S. Fish and Wildlife Service that urged the agency to add the dunes sagebrush lizard to the endangered species list.<sup>1067</sup> Sand mines in the Permian Basin of west Texas now provide one quarter of the total U.S. supply of frack sand. Texas sand is up to 50 percent cheaper than Wisconsin sand as it does not incur the cost of rail transport to reach the booming Permian Basin oil wells, although it is considered inferior to Wisconsin sand, which is crush-resistant and ideally shaped to prop open fractures to allow oil and gas to flow up the borehole.<sup>1068</sup>
- August 7, 2017 – A University of Iowa team evaluated the impact of frack sand mining and processing on the concentration of particulate matter in the air of surrounding communities. Sampling in 17 homes located within 800 meters from sand mining activities, the team found that, overall, particulate matter and silica concentrations were lower than regulations and guidelines established to prevent silicosis but spiked when winds blew over the facility. They concluded that particulate matter levels from fracking sand mining and processing were “unlikely to cause chronic adverse health conditions.” Sampling for this study, which took place in 2014, did not consider the impact of living

<sup>1065</sup> Kremer, R. (2018, December 27). 2018 was a roller-coaster year for Wisconsin’s frac sand industry. *Wisconsin Public Radio*. Retrieved from <https://www.wpr.org/2018-was-roller-coaster-year-wisconsins-frac-sand-industry>

<sup>1066</sup> Rando, R. J., Vacek, P. M., Glenn R. E., Kwon, C. W., & Parker, J. E. (2018). Retrospective assessment of respirable quartz exposure for a silicosis study of the industrial sand industry. *Annals of Work Exposures and Health*, 62(8), 1021-1032. doi: 10.1093/annweh/wxy064

<sup>1067</sup> Krebs, N. (2018, May 11). In west Texas, fracking companies face a tough challenger—the dunes sagebrush lizard. *Texas Standard*. Retrieved from <https://www.texasstandard.org/stories/in-west-texas-fracking-companies-face-a-tough-challenger-the-dunes-sagebrush-lizard/>

<sup>1068</sup> Wethe, D. (2018, July 10). Why this sand from Texas is suddenly worth \$80 a ton. *Bloomberg*. Retrieved from <https://www.yahoo.com/news/why-sand-texas-suddenly-worth-134140942.html>

near multiple adjacent frack sand operations. The industry in western Wisconsin has expanded considerably since that time.<sup>1069</sup>

- November 25, 2017 – In Minnesota, a district judge upheld Winona County’s ban on the mining, processing, and loading of frack sand. In her decision, the judge referenced public health and safety threats, fragility of the water quality in the area, and evidence for harm from sand mines in other areas. Winona is the first county in the United States to pass a countywide ban on frack sand extraction. Efforts to replicate the ban are now ongoing in neighboring counties.<sup>1070, 1071</sup>
- July 5, 2016 – The Wisconsin Department of Natural Resources (DNR) released a *Strategic Analysis for Public Review* of the state’s industrial sand mining industry that downplayed environmental health effects from air pollution. There are 128 industrial sand mine facilities in Wisconsin, including the mines themselves and processing and rail loading facilities. The DNR identified airborne particulate matter as a primary concern for industrial sand mining facilities and said that air quality monitors in western Wisconsin have not detected a problem.<sup>1072</sup> Researchers, organizations, and the native community involved in monitoring impacts of the frack sand industry challenged these findings, pointing to lack of data collection on the most dangerous kind of particulate matter called PM2.5, which represents fine particles that are less than 2.5 microns in width. These critics noted that the U.S. Environmental Protection Agency (EPA) had previously expressed concerns about the DNR’s approach to regulating PM2.5.<sup>1073</sup> Regarding groundwater, the report described elevated levels of several metals in wastewater holding ponds at the sand mines, presenting a risk to groundwater quality.
- March 25, 2016 – The Occupational Safety and Health Administration (OSHA) amended its existing standards for occupational exposure to respirable crystalline silica, “having determined that employees exposed to respirable crystalline silica at the previous permissible exposure limits face a significant risk of material impairment to their health.”<sup>1074</sup> Key provisions include the reduction of the permissible exposure limit to 50 micrograms per cubic meter of air, averaged over an 8-hour shift. The standards cover many industries with some having two years to comply; the hydraulic fracturing industry

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<sup>1069</sup> Peters, T. M., O’Shaughnessy, P. T., Grant, R., Altmaier, R., Swanton, E., Falk, J., . . . Thorne, P. S. (2017). Community airborne particulate matter from mining for sand used as hydraulic fracturing proppant. *Science of the Total Environment*, 609, 1475-1482. doi: 10.1016/j.scitotenv.2017.08.006

<sup>1070</sup> McKinney, M. (2017, November 25). Judge’s ruling on Winona County ban of frac sand mining stirs interest. *Minneapolis Star-Tribune*. Retrieved from <http://www.startribune.com/judge-s-ruling-on-winona-county-frac-sand-ban-stirs-interest/459974433/>

<sup>1071</sup> Rogers, C. (2017, November 22). District court upholds county frac sand ban. *Winona Post*. Retrieved from <http://www.winonapost.com/Article/ArticleID/57056/District-court-upholds-county-frac-sand-ban>

<sup>1072</sup> Wisconsin Department of Natural Resources. (2016). *Industrial sand mining in Wisconsin: Strategic analysis for public review*. Retrieved from <http://dnr.wi.gov/topic/EIA/documents/ISMSA/ISMSA.pdf>

<sup>1073</sup> Hubbuch, C. (2016, July 6). DNR releases frac sand analysis to immediate criticism from environmental group. *LaCrosse Tribune*. Retrieved from [http://lacrosetribune.com/news/local/dnr-releases-frac-sand-analysis-to-immediate-criticism-from-environmental/article\\_bce8ea56-fff1-52ae-97cb-c67cfb120a1f.html](http://lacrosetribune.com/news/local/dnr-releases-frac-sand-analysis-to-immediate-criticism-from-environmental/article_bce8ea56-fff1-52ae-97cb-c67cfb120a1f.html)

<sup>1074</sup> Occupational Safety and Health Administration. (2016, March 25). Occupational exposure to respirable crystalline silica. *Federal Register*. Retrieved from <https://www.federalregister.gov/articles/2016/03/25/2016-04800/occupational-exposure-to-respirable-crystalline-silica>



is allowed an additional five-year extension for engineering controls, until June 23, 2021.<sup>1075</sup> The *New York Times* reported that safety experts have advocated for a tightening of silica exposure standards for the past forty years but that “progress was stymied for decades by resistance from affected companies and regulatory inaction.” The article reported that many oil and gas companies in particular were not meeting the current silica exposure standard. The new rules, when fully in effect, are estimated to save 600 lives and prevent 900 new cases of silicosis per year.<sup>1076</sup>

- March 1, 2016 – University of Wisconsin anthropologist Thomas Pearson conducted in-depth interviews examining the impact of frack sand mining on sense of community, quality of life, and place in nearby residents. His findings indicated that the sudden influx of this heavy extractive industry has eroded residents’ sense of place and belonging and that these experiences are rarely taken into account by policymakers. Residents report “significant anxiety and stress from truck traffic, noise, light pollution, and uncertainty about environmental health impacts,” and distress caused by drastic changes to long-familiar landscapes over which they have no control. Pearson concluded that policymakers should pay closer attention to the uneven distribution of benefits and costs and “recognize that the costs go beyond quantifiable economic or environmental impacts.”<sup>1077</sup>
- January 29, 2016 – The Institute for Wisconsin’s Health, Inc. released its Health Impact Assessment (HIA) on frack sand mining operations in western Wisconsin, prepared with the participation of 15 local and tribal health departments. According to the report, the HIA was a collaborative effort. The scope of the report was limited to the potential for community-level health effects of industrial sand mining in western Wisconsin. Regarding air quality, the report concluded that health effects from the impact of industrial sand mining on community-level air quality related to particulate matter are unlikely, and that it was also unlikely that community members would be exposed to respirable crystalline silica from industrial sand mining as currently regulated. Regarding water quality, the report concluded that contamination is possible; however, health effects were unlikely. Quality of life effects were likely, but variable.<sup>1078</sup> Though it was a “Level 1 Partner” for the report, the Ho-Chunk Nation responded to the HIA with criticism, writing, “we are disappointed with the conclusions drawn in the report, particularly in the section on air quality impacts, and we believe a more robust assessment of the air quality impacts is required before such conclusions can be drawn.” They wrote that the HIA failed to provide an accurate and complete analysis of the health threats posed by this

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<sup>1075</sup> Occupational Safety and Health Administration. (2016, March 25). OSHA's Final Rule to protect workers from exposure to respirable crystalline silica. United States Department of Labor, Washington, DC. Retrieved from <https://www.osha.gov/silica/>

<sup>1076</sup> Meier, B. (2016, March 24). New rules aim to reduce silica exposure at work sites. *The New York Times*. Retrieved from [http://www.nytimes.com/2016/03/24/business/new-rules-aim-to-reduce-silica-exposure-at-work-sites.html?\\_r=1](http://www.nytimes.com/2016/03/24/business/new-rules-aim-to-reduce-silica-exposure-at-work-sites.html?_r=1)

<sup>1077</sup> Pearson, T. (2016). Frac sand mining and the disruption of place, landscape, and community in Wisconsin. *Human Organization*, 75(1), 47-58. doi: <http://dx.doi.org/10.17730/0018-7259-75.1.47>

<sup>1078</sup> Boerner, A., Young, N., & Young, D. (2016). *Health impact assessment of industrial sand mining in western Wisconsin*. Institute for Wisconsin’s Health, Inc., Madison, WI. Retrieved from [http://www.instituteforwihealth.org/uploads/1/2/7/8/12783470/iwhi\\_industrial\\_sand\\_w\\_covers.pdf](http://www.instituteforwihealth.org/uploads/1/2/7/8/12783470/iwhi_industrial_sand_w_covers.pdf)

industry because of the limited scope, and “minimal discussion about fine particulate matter (or PM<sub>2.5</sub>), which likely presents the biggest threat from industrial sand mining operations.”<sup>1079</sup> As reported by Rochester, Minnesota’s *Post-Bulletin*, Crispin Pierce, director of University of Wisconsin-Eau Claire’s environmental public health program, “believes the study ignored important air quality data collected by university students at sand mining sites at Bloomer, New Auburn and Augusta during the past 18 months,” which he described as “the only work that looked at these fine particles.”<sup>1080</sup>

- November 6, 2015 – According to findings from a pilot study led by Crispin Pierce (see entry above), levels of fine particulate matter (PM<sub>2.5</sub>) are not being adequately measured near frack sand operations. Air monitors set up by Pierce and his team consistently showed higher readings than detections measured by Wisconsin’s DNR.<sup>1081</sup> In some instances, PM<sub>2.5</sub> levels exceeded the EPA guideline of 12 micrograms per cubic meter of air. In an accompanying news story, Pierce noted that the state’s air quality data largely comes from industry itself. “‘The DNR so far has continued to shy away from doing their own monitoring,’ he said. ‘The monitoring I’ve seen so far is inadequate. People aren’t looking at PM<sub>2.5</sub>, and they really should be—from unbiased sources.’”<sup>1082</sup>
- October 15, 2015 – *InsideClimate News* reported on the response of nearby communities to the “bust” cycle of the frack sand industry in Wisconsin and Minnesota. Reactions reported included ongoing concerns that the industry does not provide permanent economic prosperity. Municipalities and community organizations are using the lull to advance protections in advance of a possible upturn: “Towns in the region are also trying to strengthening their local zoning ordinances, such as adding rules to limit industrial noise and light pollution. In other cases, communities are trying to oust pro-sand advocates from office.”<sup>1083</sup>
- June 30, 2015 – Because the amount of sand used per fracking well has increased, demand for silica sand by the oil and gas industry is still growing even though new drilling activity has taken a downturn. A global investment bank reported that fracking operations now require an average of 4.2 million pounds of sand per well. A few years

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<sup>1079</sup> Ho-Chunk Nation. (2016, March 9). *Concerns about air quality impacts and human health remain after release of industrial sand mining Health Impact Assessment* [Press release]. Retrieved from <http://midwestadvocates.org/assets/resources/Frac%20Sand%20Mining/20160309HoChunkHIARelease.pdf>

<sup>1080</sup> Lindquist, E. (2016, February 4). Report downplays frac sand link to health troubles. *Post-Bulletin*. Retrieved from [http://www.postbulletin.com/news/local/report-downplays-frac-sand-link-to-health-troubles/article\\_b3023c6c-fe74-5028-a7a4-6238fa035eaa.html](http://www.postbulletin.com/news/local/report-downplays-frac-sand-link-to-health-troubles/article_b3023c6c-fe74-5028-a7a4-6238fa035eaa.html)

<sup>1081</sup> Walters, K., Jacobson, J., Kroening, Z., & Pierce, C. (2015). PM<sub>2.5</sub> Airborne particulates near frac sand operations. *Journal of Environmental Health* 78, 8-12.

<sup>1082</sup> Schuessler, R. (2015, November 6). Wisconsin locals fear dust from mines for fracking sand even as boom wanes. *Aljazeera America*. Retrieved from <http://america.aljazeera.com/articles/2015/11/6/wisconsin-locals-fear-frac-sand-mining.html>

<sup>1083</sup> Hirji, Z. (2015, October 15). In fracking downturn, sand mining opponents not slowing down. *InsideClimate News*. Retrieved from <http://insideclimatenews.org/news/14102015/fracking-struggles-sand-mining-opponents-momentum-Minnesota-Wisconsin>

ago, silica sand comprised 9.5 percent of fracking fluid but now is closer to 20 percent. Further “rising intensity” of sand use is expected.<sup>1084</sup>

- June 15, 2015 – An investigative report by *EnergyWire* documented self-reported health impacts among residents of southwestern Wisconsin who live near silica sand mining operations that service the fracking industry. Exposure to silica dust is a proven cause of silicosis and lung cancer. (See further entries on silica sand exposure among workers in the section, “Occupational Health and Safety Hazards.”) Residents near frack sand mine operations reported exposure to dust pollution and respiratory problems. Air monitoring data from the Wisconsin DNR showed that none of the state’s 63 active sand mines were in violation for particulate matter, but, as the author noted, the state measured particles only 10 micrometers in diameter or larger.<sup>1085</sup> Below this diameter, crystalline silica particles are small enough to bypass the body’s natural clearance mechanisms and are likely to lodge deep in the lungs where they can initiate scarring, autoimmune reactions, and tumor formation.<sup>1086</sup>

### **Pipelines and compressor stations**

*There are more than 300,000 miles of natural gas transmission pipelines in the United States. They are serviced, every 40 to 100 miles, by compressor stations that maintain the pressure of the gas flowing through them. (Pump stations do the same for oil pipelines.) Compressor stations and pipelines are significant sources of air pollutants, including benzene and formaldehyde, constituting potential health risks to those living nearby while offering no economic benefits. Instead, they are associated with loss of tax revenue and economic development for the communities where they are sited and which they traverse. Pipelines and compressor stations vent methane into the atmosphere as part of routine maintenance operations and represent a climate risk. They are also accident prone. The Medical Society of the State of New York, the Massachusetts Medical Society, and the American Medical Association have each called for comprehensive health impact assessments regarding the health and safety risks associated with natural gas pipelines, which include fires, explosions, and leaks.*

- March 4, 2019 – *E&E News* investigated accidents involving “gathering lines,” which are small diameter pipelines that carry oil or gas from wellheads to processing facilities. Nationally, there are 450,000 miles of gathering lines. However, only high-pressure gathering lines in urban areas are regulated, and these represent only 18,000 miles of

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<sup>1084</sup> Chapa, S. (2015, June 30). Demand for sand: frac sand use per well goes up amid low oil prices. *San Antonio Business Journal*. Retrieved from <http://www.bizjournals.com/sanantonio/blog/eagle-ford-shale-insight/2015/06/demand-for-sand-frac-sand-use-per-well-goes-up.html>

<sup>1085</sup> King, P. (2015, June 15). Frac sand towns question whether rules protect them against silica pollution. *EnergyWire*. Retrieved from <http://www.eenews.net/stories/1060020192>

<sup>1086</sup> U.S. Department of Labor, Occupational Safety and Health Administration. (n.d.) Dust and its control. Retrieved from [https://www.osha.gov/dsg/topics/silicacrystalline/dust/chapter\\_1.html](https://www.osha.gov/dsg/topics/silicacrystalline/dust/chapter_1.html)

pipeline. The Pipeline and Hazardous Materials Safety Administration (PHMSA) has no rules for the rest. Nor do most states. Hence, it is not known how many fatalities have occurred due to explosions of gathering lines because no records are kept in rural areas. Rural gathering lines “don't have to be marked, built to standards or regularly inspected. Unlike for transmission lines, operators don't have to have emergency response plans for when they leak or explode.”<sup>1087</sup>

- February 20, 2019 – During a polar vortex on January 30, 2019, a compressor station at an underground gas storage depot in Macomb County, Michigan was destroyed by an explosion after an equipment malfunction triggered emergency venting of gas. The extremely low temperatures prevented the methane plume from dispersing, and high winds pushed it along the ground until the gas encountered heat from another compressor station and exploded. The resulting gas shortage necessitated a statewide emergency call to residents and businesses to voluntarily turn down thermostats and reduce natural gas use. General Motors in Flint suspended operations for three days.<sup>1088</sup>
- January 1, 2019 – As part of the planned Atlantic Bridge pipeline project, which will ferry fracked natural gas from New Jersey through New England and into Canada, Calgary-based Enbridge Inc. (formerly Spectra Energy) applied to site a 7,700-horsepower compressor station in Weymouth, Massachusetts, south of Boston. The Enbridge compressor station in Weymouth would maintain pipeline pressure needed to push the gas north to Maine and Canada. In 2016, the company offered the town \$47 million to drop its opposition to the plan, which would place the compressor station in a port area immediately adjacent to densely populated neighborhood, the highly utilized Fore River lift bridge, a power plant, a sewage pumping station, and a gas metering station. Instead, residents and local political leaders rejected this offer and demanded a Health Impact Assessment (HIA). Ordered by Governor Charlie Baker in July 2017 and released in January 2019, this study received considerable criticism from the public health community due to its deviation from standard HIA methodologies. The HIA showed that the Fore River Basin already suffered from levels of benzene, formaldehyde, and other air toxics that exceeded state guidelines for these carcinogens while concluding that adding another source of these same pollutants would have negligible impact on residents' health.<sup>1089, 1090</sup> Shortly thereafter, the Massachusetts Department of Environmental Protection issued an air quality permit for the compressor station. This decision—and the HIA's conclusion on which it was based—was immediately contested

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<sup>1087</sup> Lee, M., & Soraghan, M. (2019, March 4). Deadly pipelines, no rules. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060123021>

<sup>1088</sup> LeBlanc, B. (2019, February 20). Consumers CEO: Two natural gas plants still down after Jan. 30 fire. *Detroit News*. Retrieved from <https://www.detroitnews.com/story/news/local/michigan/2019/02/20/consumers-energy-two-plants-still-down-after-fire-emergency-appeal/2928041002/>

<sup>1089</sup> The Massachusetts Department of Environmental Protection, the Massachusetts Department of Public Health, & the Metropolitan Area Planning Council. (2019, January 1). Health Impact Assessment of a proposed natural gas compressor station in Weymouth, MA. Retrieved from <https://www.mass.gov/files/documents/2019/02/14/Health-Impact-Assessment-Weymouth-Final-Report.pdf>

<sup>1090</sup> Trufant, Jessica. (2019, January 11). Regulators issue air permit for Weymouth compressor station. *The Patriot Ledger*. Retrieved from <https://www.patriotledger.com/news/20190111/regulators-issue-air-permit-for-weymouth-compressor-station>

by independent public health researchers. In February 2019, Greater Boston Physicians for Social Responsibility (GBPSR) issued their own report on the health risks of the Weymouth compressor that outlined their concerns about the safety and emergency response hazards associated with the proposed compressor and rejected the “no health impact” conclusion of the HIA. While the HIA acknowledged that the residents of the Fore River Basin already experienced excess rates of lung disease, heart disease, and cancer, the GBPSR report argued that disproportionately health-burdened people “require greater, not lesser, environmental safeguards.”<sup>1091, 1092</sup> At this writing, the air quality permit, which was greenlighted by the HIA’s findings, is under appeal before the Massachusetts Department of Environmental Protection.

- December 18, 2018 – “Given that many pipelines transport volatile, flammable, or toxic oil and liquids, and given the potential consequences of a successful physical or cyber-attack, pipeline systems are attractive targets for terrorists, hackers, foreign nations, criminal groups, and others with malicious intent,” according to a report from the U.S. Government Accountability Office that urged the U.S. Department of Homeland Security’s Transportation Security Administration (TSA) to address weaknesses in its management of pipeline security. TSA oversees the physical security and cybersecurity of the more than 2.7 million miles of gas, oil, and hazardous liquid pipelines in the United States.<sup>1093</sup>
- December 14, 2018 – The California Public Utilities Commission (CPUC) took action against Pacific Gas and Electric Company (PG&E) for what CPUC said are systemic violations of rules to prevent damage to natural gas pipelines during excavation activities. PG&E had been noncompliant with the law pertaining to the locating and marking of natural gas distribution pipelines, as well as related requirements to inform construction personnel and private persons on the location of PG&E’s underground pipes and other natural gas infrastructure in a timely and accurate manner.<sup>1094, 1095, 1096</sup>
- December 10, 2018 – The Atlantic Coast Pipeline is a 600-mile project led by Dominion Energy that would extend from West Virginia to eastern North Carolina. Construction was halted when the U.S. Court of Appeals stayed a permit from the U.S. Fish and

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<sup>1091</sup> Greater Boston Physicians for Social Responsibility. (2019, February 7). Health risks of a proposed compressor station in Weymouth, Massachusetts. Retrieved from [https://d279m997dpfwgl.cloudfront.net/wp/2019/02/GB-PSR-Report-on-Health-Risks-of-Proposed-Weymouth-Compressor-Station\\_Feb-7-2019.pdf](https://d279m997dpfwgl.cloudfront.net/wp/2019/02/GB-PSR-Report-on-Health-Risks-of-Proposed-Weymouth-Compressor-Station_Feb-7-2019.pdf)

<sup>1092</sup> Trufant, Jessica. (2019, February 7). Doctors’ group challenges report on Weymouth compressor station. Retrieved from <https://www.patriotledger.com/news/20190207/doctors-group-challenges-report-on-weymouth-compressor-station>

<sup>1093</sup> U.S. Government Accountability Office (GAO). (2018, December 18). *Critical infrastructure protection: Actions needed to address significant weaknesses in TSA’s Pipeline Security Program management*. GAO-19-48. Retrieved from <https://www.gao.gov/products/GAO-19-48>

<sup>1094</sup> California Public Utilities Commission (CPUC). (2018, December 14). Order instituting investigation and order to show cause. Retrieved from <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M246/K120/246120841.PDF>

<sup>1095</sup> California Public Utilities Commission (CPUC). (2018, December 14). CPUC opens case against PG&E for potential natural gas safety violations. Retrieved from <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M250/K897/250897740.PDF>

<sup>1096</sup> Gonzales, R. (2018, December 14). PG&E falsified gas pipeline safety records, regulators say. *NPR*. Retrieved from <https://www.npr.org/2018/12/14/677003961/pg-e-falsified-gas-pipeline-safety-records-regulators-say>

Wildlife Service that had authorized building the pipeline in critical habitat for four endangered species: the Indiana bat, the rusty-patched bumblebee, the clubshell mussel, and a shrimp-like crustacean called the Madison Cave isopod.<sup>1097</sup>

- November 15, 2018 – An *E&E News* analysis of interstate pipeline enforcement found that interstate pipelines have caught fire or exploded 137 times since 2010. In 90 percent of those disasters, no fines were levied by PHMSA (the federal agency that directly regulates 350,000 miles of pipelines, more than 400 natural gas storage facilities, and 26 liquefied natural gas facilities). PHMSA's reluctance to levy fines is a direct result of federal pipeline laws, which were largely drafted after 1994 when deregulation was a federal priority.<sup>1098</sup>
- November 1, 2018 – A Russian team used a cartographic model to assess the potential impact on health and environment of compressor station emissions during scheduled outages and repairs. They described a method of gas flow redistribution that would obviate the need for large-scale venting of methane into the atmosphere.<sup>1099</sup>
- October 11, 2018 – Overpressurizing a natural gas distribution system while replacing aging pipelines triggered 80 simultaneous natural gas explosions in Massachusetts' Merrimack Valley on September 13, 2018. One teenager was killed, 23 were injured, 130 buildings were destroyed or damaged, and thousands evacuated from communities in Lawrence, Andover, and North Andover. The explosions cost Columbia Gas more than \$1 billion.<sup>1100</sup>
- September 10, 2018 – A landslide triggered by four days of intense rain caused a pipeline explosion that burned down a house in Beaver County, Pennsylvania and prompted evacuations. This pipeline, built by Energy Transfer Partners (which merged with Sunoco in 2017), was part of the Mariner 2 East Pipeline that is intended to carry the liquid hydrocarbon, ethane, to coastal ports where it will be exported for plastics manufacturing abroad. In western Pennsylvania, ethane co-occurs with methane in the shale bedrock and is released during fracking operations.<sup>1101, 1102, 1103</sup>

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<sup>1097</sup> Murawski, J. (2018, December 10). Atlantic Coast Pipeline construction halts as court reviews 4 endangered species. *Raleigh News and Observer*. Retrieved from <https://www.newsobserver.com/news/business/article222856155.html>

<sup>1098</sup> Soraghan, M. (2018, November 15). No penalties for 90% of pipeline blasts. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060106253>

<sup>1099</sup> Strizhenok, A. V., & Korelskiy, D. S. (2019). Estimation and reduction of methane emissions at the scheduled and repair outages of gas-compressor units. *Journal of Ecological Engineering*, 20(1), 46-51. Advance online publication. Retrieved from <https://doi.org/10.12911/22998993/93943>

<sup>1100</sup> National Transportation Safety Board. (2018, October 11). Preliminary report pipeline: Over-pressure of a Columbia Gas of Massachusetts low-pressure natural gas distribution system. Retrieved from <https://www.nts.gov/investigations/AccidentReports/Pages/PLD18MR003-preliminary-report.aspx>

<sup>1101</sup> Mamula, K., & Litvak, A. (2018, September 10). Officials believe landslide may have triggered massive gas pipeline explosion in Beaver County. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/local/west/2018/09/10/gas-explosion-in-center-township-Beaver-County/stories/201809100067>

<sup>1102</sup> Litvak, A. (2018, October 27). Pipeline ruptures bring new scrutiny to Pennsylvania geology. *Pittsburgh Post-Gazette*. Retrieved from

- August 10, 2018 – A joint investigation by the *Charleston Gazette-Mail* and *ProPublica* found that pipeline operators continue to break environmental rules, and state and federal agencies continue to clear roadblocks to allow these projects to move forward despite serious unanswered questions.<sup>1104</sup>
- July 25, 2018 – The Attorneys General of six states (Massachusetts, Rhode Island, New Jersey, Maryland, Illinois, Washington) and the District of Columbia submitted comments to the Federal Energy Regulatory Commission (FERC) on how the Commission should revise its approach to certifying new natural gas transportation facilities. They recommended that the Commission assess need on a comprehensive, regional basis; consider environmental harm, including climate impacts that consider the social costs of carbon; and more heavily weigh the harm of eminent domain. They urged better incorporation of state and local land use policies. And they recommended that the Commission no longer issue partial notices to proceed with construction when rehearing requests are pending.<sup>1105</sup>
- May 24, 2018 – The Office of the Inspector General at the Department of Energy audited FERC’s Natural Gas Certification Process. It found that FERC lacked a consistent process for tracking public comments on proposed pipeline projects, suggesting that all comments might not be reviewed. “In the absence of a consistent methodology, we did not verify to what degree comments received by FERC were considered, aggregated, and reflected in the environmental documents or final orders for the certificate applications during our review,” the report concluded. “The lack of a consistent methodology could increase the risk that FERC may not address significant and impactful public comments in the environmental document or final order.”<sup>1106, 1107</sup>
- May 16, 2018 – A team of researchers in Alberta, Canada investigated how noise from natural gas compressor stations and oil wells affected the behavior and communication of

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<https://apnews.com/2e0005ec7db342a290199a4d8464b5a0?fbclid=IwAR0URr9dtHnpoe7YkokfOOVDUcyVdmeXejjUgVSIAeoY5gZH6Olm394NMkU>

<sup>1103</sup> Litvak, A. (2018, September 14). Who gets to say where it's safe to build a pipeline? *Pittsburgh Post-Gazette*. Retrieved from <https://www.post-gazette.com/business/powersource/2018/09/14/Who-gets-to-say-where-it-s-safe-to-build-a-pipeline-natural-gas-beaver-county-explosion-DEP-Pennsylvania/stories/201809140058>

<sup>1104</sup> Mishkin, K., & Ward Jr., K. (2018, August 10). What happens when a pipeline runs afoul of government rules? Authorities change the rules. *ProPublica*. Retrieved from <https://www.propublica.org/article/west-virginia-halted-mountain-valley-pipeline>

<sup>1105</sup> Comments of the Attorneys General of Massachusetts, Illinois, Maryland, New Jersey, Rhode Island, Washington, and the District of Columbia. FERC Docket PL18-1-000. (2018, July 25). Certification of New Interstate Natural Gas Facilities. Retrieved from <https://www.mass.gov/files/documents/2018/07/26/Multistate%20Comments-FERC%201999%20PL%20Policy%20Review.pdf>

<sup>1106</sup> McKenna, P. (2018, May 31). Public comments on pipeline plans may be slipping through cracks at FERC, audit says. *Inside Climate News*. Retrieved from <https://insideclimatenews.org/news/31052018/public-comments-oil-gas-pipelines-ferc-review-energy-department-inspector-general-audit>

<sup>1107</sup> The Office of the Inspector General at the Department of Energy. (2018, May 24). *The Federal Energy Regulatory Commission’s Natural Gas Certification Process*. Audit Report: DOE-OIG-18-33. Retrieved from <https://www.energy.gov/ig/downloads/audit-report-doe-oig-18-33>

Savannah sparrows (*Passerculus sandwichensis*). The results showed that alarm responses and feeding visits were impaired by noise-producing infrastructure. Savannah sparrows were less vigilant when provisioning nestlings and distracted from their reproductive tasks when in the vicinity of compressor stations. “Our observation that Savannah sparrows are less responsive to anti-predator signals in the vicinity of natural gas compressor stations is of conservation concern and adds to a growing body of evidence that noisy anthropogenic structures have the potential to negatively affect birds by interfering with acoustic communication.”<sup>1108</sup> Previous research in the same region found that the Savannah sparrow altered its song structure and song features when exposed to noise from oil and gas infrastructure, including compressor stations, and that these noise-altered songs were less effective at provoking responses from other birds.<sup>1109</sup><sup>1110</sup> Similarly, researcher working in the San Juan Basin of New Mexico found that chronic noise from drilling and fracking operations, including compressor stations, affected levels of stress hormones in songbirds and masked critical acoustic cues in ways that decreased the birds’ ability to survive and reproduce.<sup>1111, 1112</sup>

- April 26, 2018 – Studies that investigate the health impacts of drilling and fracking activities typically incorporate the distance between participants’ home addresses and well pads and do not consider potential exposures to emissions from other ancillary pieces of infrastructure. A study led by Johns Hopkins University researchers working in Pennsylvania attempted to develop exposure metrics for air emissions from compressor stations, flare stacks, and impoundments. The research team identified 457 compressor stations in Pennsylvania and 1419 compressor station engines. Data on compressor stations engines were not available electronically, and only 361 stations could be confirmed as operational. The team found that compressor engines, impoundments, and flaring events are all potential sources of emissions related to drilling and fracking that have not previously been accounted for in epidemiological studies “in part because data are not readily available. The value of including these additional sources of information on [fracking], particularly in health studies, remains unknown.”<sup>1113</sup>

<sup>1108</sup> Antze, B., & Koper, N. (2018). Noisy anthropogenic infrastructure interferes with alarm responses in Savannah sparrows (*Passerculus sandwichensis*). *Royal Society Open Science*, 5, 172168. doi: 10.1098/rsos.172168

<sup>1109</sup> Warrington, M. H., Curry, C. M., Antze, B., & Koper, N. (2018). Noise from four types of extractive energy infrastructure affects song features of Savannah Sparrows. *The Condor: Ornithological Applications*, 120(1), 1-15. Advance online publication. Retrieved from <https://bioone.org/journals/the-condor/volume-120/issue-1/CONDOR-17-69.1/Noise-from-four-types-of-extractive-energy-infrastructure-affects-song/10.1650/CONDOR-17-69.1.short>

<sup>1110</sup> Curry, C. M., Des Brisay, P. G., Rosa, P., & Koper, N. (2018). Noise source and individual physiology mediate effectiveness of bird songs adjusted to anthropogenic noise. *Scientific Reports*, 8(1), 3942. doi: 10.1038/s41598-018-22253-5

<sup>1111</sup> Kleist, N. J., Guralnick, R. P., Cruz, A., Lowry, C. A., & Francis, C. D. (2018). Chronic anthropogenic noise disrupts glucocorticoid signaling and has multiple effects on fitness in an avian community. *PNAS*, 115(4), E648-E657. doi: 10.1073/pnas.1709200115

<sup>1112</sup> University of Colorado at Boulder. (2018, January 8). Noise from oil and gas operations stresses birds, hinders reproduction. *AAAS EurekAlert*. Retrieved from [https://www.eurekalert.org/pub\\_releases/2018-01/uoca-nfo010318.php](https://www.eurekalert.org/pub_releases/2018-01/uoca-nfo010318.php)

<sup>1113</sup> Koehler, K., Ellis, J. H., Casey, J. A., Manthos, D., Bandeen-Roche, K., Platt, R., & Schwartz, B. S. (2018). Exposure assessment using secondary data sources in unconventional natural gas development and health studies. *Environmental Science & Technology*, 52, 6061-6069. doi: 10.1021/acs.est.8b00507



- April 26, 2018 – Pipelines are inspected and cleaned through a process called pigging, in which devices are placed inside, and travel through, the pipe. Pigs can be used to force water or air through a pipeline, check for obstructions, detect leaks, scrape debris from the pipe wall, prevent corrosion, or apply coatings. Pigging is necessarily accompanied by venting of hydrocarbon gases into the air, including methane. A federal settlement acknowledged that the use of the maintenance pigging technique is a major source of harmful emissions in pipeline systems carrying fracked gas extracted from shale that also contains other hydrocarbons, such as natural gas liquids. “The settlement between the U.S. Department of Justice, Environmental Protection Agency and Pennsylvania Department of Environmental Protection and two MarkWest subsidiaries ... alleges the company failed to apply for or comply with air pollution permits. As a result, the company unlawfully vented hundreds of tons of natural gas and volatile organic compounds.”<sup>1114</sup>
- October 12, 2017 – Researchers at University of Albany’s Institute for Health and the Environment prepared a 300-page technical report on the health effects of the emissions from 18 natural gas compressor stations in New York State. The team found that, collectively, these sites released 40 million pounds of 70 different contaminants over a seven-year period, making natural gas compressor stations the seventh largest point source of air pollution in the state. By volume, the largest emissions were nitrogen oxides, carbon monoxide, volatile organic compounds (VOCs), formaldehyde, and particulate matter. Exposure to these chemicals is linked to cancer, as well as cardiovascular, neurological, and developmental disorders. The authors noted, “The potential health impacts of the large volumes of pollutants generated by natural gas compressor stations have not been addressed, let alone answered, by those arguing for their construction and expansion.”<sup>1115</sup>
- October 11, 2017 – A study of airborne methane emissions from assorted components of natural gas infrastructure in California, including compressor stations and storage facilities, confirmed earlier studies in finding widely variable leakages. The results suggested that a significant fraction of the methane emitted from storage facilities may, in fact, be escaping from their associated compressor stations.<sup>1116</sup>
- July 17, 2017 – A comprehensive investigation of the pipeline approval process by the Center for Public Integrity, *StateImpact Pennsylvania*, and National Public Radio found that FERC, which is charged with ensuring the public’s interest, routinely assesses need based on company filings and functions as an agency captured by industry interests, concluding, “at every turn, the agency’s process favors the pipeline companies.” The

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<sup>1114</sup> Patterson, B. (2018, April 26). MarkWest agrees to pay millions in federal settlement over 'pig' emissions. *West Virginia Public Broadcasting*. Retrieved from <https://www.wvpublic.org/post/markwest-agrees-pay-millions-federal-settlement-over-pig-emissions#stream/0>

<sup>1115</sup> Russo, P. N., & Carpenter, D. O. (2017, October 12). *Health effects associated with stack chemical emissions from NYS natural gas compressor stations, 2008-2014*. Retrieved from [https://www.albany.edu/about/assets/Complete\\_report.pdf](https://www.albany.edu/about/assets/Complete_report.pdf)

<sup>1116</sup> Mehrotra, S., Faloona, I., Suard, M., Conley, S., & Fischer, M. L. (2017). Airborne methane emission measurements for selected oil and gas facilities across California. *Environmental Science & Technology* 51(21), 12981–12987. doi: 10.1021/acs.est.7b03254

result, according to this analysis of more than 500 pipeline cases, is that the financial interests of the gas industry, and not market demand or public necessity, is driving the ongoing pipeline build-out. In some cases, utility companies have complex financial ties to the pipeline companies that service them.<sup>1117</sup> Continuing this investigation, *InsideClimate News* then reviewed several large, new pipeline proposals in the Marcellus and Utica Shale regions, focusing on joint ventures and interlocking financial relationships between customers (state-regulated utilities) and suppliers (pipeline companies). Affiliate agreements that allow parent companies of utilities to seek federal certificates for interstate pipelines—which typically allow a 14 percent return on equity—contribute to the ongoing frenzy of pipeline construction even when natural gas demand is flat. Existing pipelines, the investigation noted, run at only slightly more than half capacity.<sup>1118</sup>

- July 12, 2017 – A Canadian study found that oil and gas infrastructure, including compressor stations, contributes to habitat fragmentation and increases parasitism by cowbirds on Savannah sparrow nests in the Northern Great Plains. Populations of North American grassland songbirds, including the Savannah sparrow, are declining precipitously, mostly due to habitat loss and degradation. These results suggest that “brood parasitism associated with oil and natural gas infrastructure may result in additional pressures that reduce the productivity of this declining grassland songbird.”<sup>1119</sup>
- May 16, 2017 – An analysis of records from state agencies revealed that low-pressure flow lines at oil and gas well sites are responsible for more than 7,000 spills, leaks, and accidents since 2009. Flow lines carry oil, gas, or wastewater from scattered pieces of equipment within a production site. Other than in New Mexico, operators are not required to report gas leaks from flow lines. A fatal explosion in April 2017 in a Firestone, Colorado home built on top of an oil field was triggered when an abandoned flow line seeped gas into a basement where it ignited. Two people were killed and one person was badly injured. Soon after, Colorado Governor John Hickenlooper ordered a statewide review of all oil and gas lines located near occupied buildings. Preliminary data showed that 16,000 wells across Colorado have flow lines that lie within 1,000 feet of homes. Corrosion is a leading cause of flow line failures.<sup>1120, 1121</sup>

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<sup>1117</sup> Lombardi, K., & Hopkins, J. S. (2017, July 17). Natural gas building boom fuels climate worries, enrages landowners. *NPR.org*. Retrieved from

<http://www.npr.org/2017/07/17/536708576/natural-gas-building-boom-fuels-climate-worries-enrages-landowners>

<sup>1118</sup> McKenna, P. (2007, August 3). Pipeline payday: How builders win big, whether more gas is needed or not. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/02082017/natural-gas-pipeline-boom-corporate-profit-bubble-limited-demand-climate-emissions>

<sup>1119</sup> Bernath-Plaisted, J., Nenninger, H., & Koper, N. (2017). Conventional oil and natural gas infrastructure increases brown-headed cowbird (*Molothrus ater*) relative abundance and parasitism in mixed-grass prairie. *Royal Society Open Science*, 4(7), 170036. doi: 10.1098/rsos.170036

<sup>1120</sup> Soraghan, M. (2017, May 16). Flow lines cited in more than 7K spills. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060054568>

<sup>1121</sup> Lee, M. (2017, June 12). Fatal explosion threatens more upheaval over drilling in Colo. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060055846>

- February 15, 2017 – A team of researchers from University of Texas investigated emissions from natural gas compressor stations throughout Pennsylvania and New York. They found that compressors emitted highly variable plumes of methane that spread downwind and were measurable a full mile away at levels that could expose nearby residents, especially during temperature inversions. The researchers concluded, “Our data indicate that compressor stations are likely sources of methane emissions and presumably co-emitted air contaminants, and can sporadically/episodically emit methane at relatively high levels...if such facilities are to be permitted to release specified amounts of contaminants, those amounts should be actively measured and verified. Without measurement there can be no assurance that permit conditions are being met.”<sup>1122</sup>
- November 30, 2016 – A CityLab investigation used data from the Pipeline and Hazardous Materials Safety Administration to map all significant U.S. pipeline accidents between 1986 and 2016 and concluded, “wherever pipelines are extended, deadly accidents will follow.” Pipeline accidents over the past 30 years have resulted in 548 deaths, more than 2,500 injuries, and over \$8.5 billion in damages. Accidents are particularly common in Texas and Louisiana.<sup>1123</sup>
- July 5, 2016 – The National Energy Board, Canada’s pipeline watchdog, gave two of Canada’s largest pipeline companies six months to fix severe deficiencies in pipelines, ultimately issuing an emergency safety order in February 2016. Newly released federal documents showed that Texas-based Kinder Morgan and Alberta-based Enbridge were both looking into the use of defective parts purchased from Thailand-based Canadoil Asia that recently went bankrupt. U.S. regulators warned of these deficiencies eight years prior. At least one Canadian pipeline with defective materials exploded during that period.<sup>1124</sup>
- June 10, 2016 – EPA Region 2 submitted comments to FERC on Docket Nos. PFI6-3, Eastern System Upgrade Project, which includes new natural gas compressor stations in Hancock and Highland, New York. The EPA submission suggested an analysis of whether this project was needed; clarification of what is meant by a loop system; evaluation of alternatives; a comprehensive analysis of cumulative, indirect, and secondary impacts; information on greenhouse gas emissions and climate change impacts; a Health Impact Assessment; the inclusion of all pollution prevention practices; and a consideration of environmental justice concerns.<sup>1125</sup> The company agreed to provide funding toward a health study but wished to retain the ability to determine the

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<sup>1122</sup> Payne, B. F., Ackley, R., Wickler, A. P., Hildenbrand, Z., Carlton, Jr., D. D., & Schug, K. A. (2017). Characterization of methane plumes downwind of natural gas compressor stations in Pennsylvania and New York. *Science of the Total Environment*, 580, 1214-21. doi: 10.1016/j.scitotenv.2016.12.082

<sup>1123</sup> Joseph, G. (2016, November 30). 30 years of oil and gas pipeline accidents, mapped. *CityLab*. Retrieved from <https://www.citylab.com/environment/2016/11/30-years-of-pipeline-accidents-mapped/509066/>

<sup>1124</sup> De Souza, M. (2016, July 5). How Canada’s pipeline watchdog secretly discusses ‘ticking time bombs’ with industry. *National Observer*. Retrieved from <http://www.nationalobserver.com/2016/07/05/news/how-canada%E2%80%99s-pipeline-watchdog-secretly-discusses-ticking-time-bombs-industry>

<sup>1125</sup> EPA Region 2. (2016, June 10). Docket Nos. PFI6-3, Eastern System Upgrade Project (comments). Retrieved from [https://elibrary.ferc.gov/idmws/file\\_list.asp?document\\_id=14468753](https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14468753)

study parameters.<sup>1126</sup> Skeptical of the health study's funding and parameters, residents and potentially impacted towns objected to the company's dismissal of the towns' laws prohibiting the construction and operation of heavy industrial use facilities. The Deputy Supervisor of one of the affected towns "said he was encouraged by the federal Environmental Protection Agency's comments on the project's preliminary federal application. He said the EPA concerns were 'the same as ours.'"<sup>1127</sup>

- April 27, 2016 – In its report on two natural gas pipeline expansion projects in Appalachia, the Institute for Energy Economics and Financial Analysis demonstrated that the Atlantic Coast and Mountain Valley pipelines are “emblematic of the risks that such expansion creates for ratepayers, investors and landowners.” The report concluded that pipelines out of the Marcellus and Utica region are being overbuilt, putting ratepayers at risk of paying for excess capacity, landowners at risk of losing their property to unnecessary projects, and investors at risk of loss. The report stated that FERC facilitates this building of excess pipeline capacity and its approach for assessing need is insufficient.<sup>1128</sup>
- April 22, 2016 – The federal Agency for Toxic Substances and Disease Registry (ATSDR) released a report on air quality near a natural gas compressor station in Brooklyn Township, Susquehanna County, Pennsylvania, finding levels of fine particulate matter (PM<sub>2.5</sub>) at levels that can damage human health in those with long-term exposure. Evaluating data from an 18-day EPA field air monitoring event, the report found that the average ambient 24-hour PM<sub>2.5</sub> concentration observed at one residence (19 µg/m<sup>3</sup>) was higher than the nearest regional National Ambient Air Quality Standards (NAAQS) monitoring station (12.3 µg/m<sup>3</sup>) in Scranton, PA, over the same period. ATSDR concluded that there was evidence that long-term exposure to PM<sub>2.5</sub> at the levels found can cause an increase in mortality, respiratory problems, hospitalizations, preterm births, and low birth weight. The agency said that in the short term, exposure could be harmful to sensitive populations, such as those with respiratory problems or heart disease. The agency recommended that sensitive individuals monitor air quality and limit activity accordingly, and that the PA DEP work to reduce other sources of PM and its precursors.<sup>1129</sup>
- April 3, 2016 – The Southwest Pennsylvania Environmental Health Project issued a *Technical Report* in response to the January 29, 2016 federal ATSDR report on the Brigich compressor station in Chartiers Township, Washington County, Pennsylvania.

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<sup>1126</sup> Mayer, F. (2016, April 27). Millennium to pay for health study. *River Reporter*. Retrieved from <http://www.riverreporter.com/news/4302/2016/04/27/millennium-pay-health-study>

<sup>1127</sup> Julse, D. (2016, June 22). Highland concerned about study underfunding. *River Reporter*. Retrieved from <http://www.riverreporter.com/news/4302/2016/06/22/highland-concerned-about-study-underfunding>

<sup>1128</sup> Kunkel, C., & Sanzillo, T. (2016). *Risks associated with natural gas pipeline expansion in Appalachia*. The Institute for Energy Economics and Financial Analysis. Retrieved from [http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-\\_April-2016.pdf](http://ieefa.org/wp-content/uploads/2016/04/Risks-Associated-With-Natural-Gas-Pipeline-Expansion-in-Appalachia-_April-2016.pdf)

<sup>1129</sup> Agency for Toxic Substances and Disease Registry. (2016, April 22). *Health Consultation: Brooklyn Township PM<sub>2.5</sub>, Brooklyn Township, Susquehanna County, Pennsylvania*. U.S. Department of Health and Human Services, Atlanta, GA. Retrieved from [http://www.atsdr.cdc.gov/HAC/pha/BrooklynTownship/BrooklynTwmsp\\_pm2-5\\_HC\\_Final\\_04-22-2016\\_508.pdf](http://www.atsdr.cdc.gov/HAC/pha/BrooklynTownship/BrooklynTwmsp_pm2-5_HC_Final_04-22-2016_508.pdf)

ATSDR detected chemicals that had been reported at gas sites previously, and this confirmation of their presence provided “an important acknowledgement that neighbors of such facilities are being exposed (often at very close range) to chemicals that bring with them the possibility of short- and long-term health effects.” The report stated that, in conjunction with the monitoring work of the EPA, ATSDR “provided a solid set of data.” However, due to the limitations of the methodologies available to them, the authors were “concerned that there was, in the end, an underestimate of risk to community members.”<sup>1130</sup>

- April 1, 2016 – Kinder Morgan, the largest energy infrastructure company in North America, suspended construction of a \$1 billion pipeline project that would have carried gasoline and diesel fuel across the southeastern United States. Construction was suspended after landowners protested the seizure of their property, a Georgia Superior Court judge upheld a decision denying a certificate that would have allowed the company to use eminent domain, and the state legislature passed legislation to block the property seizure.<sup>1131</sup>
- March 26, 2016 – According to a Boston University-led study, fugitive emissions from urban natural gas pipeline systems were the largest anthropogenic source of the greenhouse gas methane in the United States and contribute to the risk of explosions in urban environments, with 15 percent of leaks qualifying as potentially explosive.<sup>1132</sup> “All leaks must be addressed, as even small leaks cannot be disregarded as ‘safely leaking,’” concluded the report authors. In an interview with *InsideClimate News*, the lead author said that in addition to weighing the safety risks from gas leaks, regulators and utility companies must also consider the climate impact of leaks when determining priorities for repairing and replacing pipes.<sup>1133</sup>
- March 7, 2016 – A lawsuit filed against FERC in U.S. District Court in Washington, D.C. challenged the agency’s relationship with industry, reported *Penn Live*: “The suit accuses the commission of regulatory capture, a situation in which corporations control regulators.” FERC receives all of its funding from the energy companies that it regulates and had never rejected a pipeline plan, which, according to the complainant, demonstrates “clear bias and corruption.”<sup>1134</sup>

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<sup>1130</sup> Southwest Pennsylvania Environmental Health Project. (2016, April 3). ATSDR releases investigation of Pennsylvania compressor station. *Response to Governmental Action and Publication, 1*. Retrieved from <http://www.environmentalhealthproject.org/resources/research-factsheets>

<sup>1131</sup> McKenna, P. (2016, April 1). Property rights outcry stops billion-dollar pipeline project in Georgia. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/01042016/palmetto-pipeline-kinder-morgan-georgia-eminent-domain-oil-gas-republicans>

<sup>1132</sup> Hendrick, M. F., Ackley, R., Sanaie-Movahed, B., Tang, X., & Phillips, N.G. (2016). Fugitive methane emissions from leak-prone natural gas distribution infrastructure in urban environments. *Environmental Pollution*, 213, 710–716. doi:10.1016/j.envpol.2016.01.094

<sup>1133</sup> McKenna, P. (2016, March 31). Methane hazard lurks in Boston's aging, leaking gas pipes, study says. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/30032016/boston-natural-gas-pipelines-leaking-methane-climate-change-explosion>

<sup>1134</sup> Pynes, M. (2016, March 7). Federal agency funded by energy industry has never rejected a pipeline plan. *PennLive.com*. Retrieved from [http://www.pennlive.com/news/2016/03/pipeline\\_fights\\_raise\\_big\\_ques.html#incart\\_article\\_small](http://www.pennlive.com/news/2016/03/pipeline_fights_raise_big_ques.html#incart_article_small)

- February 26, 2016 – Congressman Chris Gibson (NY-19), in response to citizen concerns, sent a letter to FERC regarding the proposed 41,000-horsepower compressor station in southern Rensselaer County, New York, part of the Northeast Energy Direct (NED) pipeline project. He discussed the inadequacy of federal exposure standards with regard to exposures at compressor sites and lack of medical expertise in these decisions. He requested public health expertise on all Environmental Assessment and Environmental Impact Statement teams, an independent panel to review the federal exposure standards around compressor stations, and “a transparent and effective review process.”<sup>1135</sup> His call was supported by other elected officials, as well as public health researcher David O. Carpenter, MD, who has studied compressor station pollutants.<sup>1136</sup>
- January 29, 2016 – ATSDR, in collaboration with the EPA Region 3 Air Protection Division, conducted an exposure investigation to evaluate exposures of residents living near the Brigich natural gas compressor station in Chartiers Township, Washington County, Pennsylvania. ATSDR concluded that, although exposure to the levels of chemicals detected in the ambient air was not expected to harm the health of the general population, “some sensitive subpopulations (e.g., asthmatics, elderly) may experience harmful effects from exposures to hydrogen sulfide and PM 2.5 [and] [s]ome individuals may also be sensitive to aldehyde exposures, including glutaraldehyde.” According to ATSDR, one of the study’s limitations was that the sampling “may not have adequately captured uncommon but significant incidents when peak emissions (e.g. unscheduled facility incidents, blowdowns or flaring events) coincide with unfavorable meteorological conditions (e.g. air inversion).” ATSDR recommendations included reducing exposures to the chemicals of concern to protect sensitive populations, continued collection of emissions data for long-term and peak exposures, and air modeling to better understand ambient air quality.<sup>1137</sup>
- December 8, 2015 – The Niagara County Legislature, following the recommendations of the Medical Society of the State of New York, called for a Health Impact Assessment (HIA) on natural gas infrastructure, including compressor stations, and co-hosted a conference in Albany on the Medical Society’s health findings. A compressor station with twin compressors, part of the “2016 Northern Access Plan” to transfer gas from Pennsylvania to Canada, is proposed for the county.<sup>1138</sup>

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<sup>1135</sup> Gibson, C. (2016, February 26). Compressor station needs review. *Sullivan County Democrat*. Retrieved from <http://scdemocratonline.com/webpages/letterdetail.aspx?id=9f047d33-ba32-4027-883b-ff2e457ebb7a>

<sup>1136</sup> Nearing, B. (2016, March 31). Gibson: Federal natural gas air pollution safety standards may be obsolete. *Albany Times Union*. Retrieved from <http://www.timesunion.com/business/article/Gibson-Federal-natural-gas-air-pollution-safety-7221271.php>

<sup>1137</sup> Agency for Toxic Substances and Disease Registry. (2016, January 29). *Health Consultation: Exposure Investigation, Natural Gas Ambient Air Quality Monitoring Initiative Brigich Compressor Station, Chartiers Township, Washington County, Pennsylvania*. Retrieved from [http://www.atsdr.cdc.gov/HAC/pha/Brigich\\_Compressor\\_Station/Brigich\\_Compressor\\_Station\\_EI\\_HC\\_01-29-2016\\_508.pdf](http://www.atsdr.cdc.gov/HAC/pha/Brigich_Compressor_Station/Brigich_Compressor_Station_EI_HC_01-29-2016_508.pdf)

<sup>1138</sup> Staff. (2015, December 8). County lawmakers call for study on compressor health risks. *Lockport Union-Sun & Journal*. Retrieved from [http://www.lockportjournal.com/news/local\\_news/county-lawmakers-call-for-study-on-compressor-health-risks/article\\_932989cd-058a-594f-9ef2-e52827db85a6.html](http://www.lockportjournal.com/news/local_news/county-lawmakers-call-for-study-on-compressor-health-risks/article_932989cd-058a-594f-9ef2-e52827db85a6.html)

- November 9, 2015 – Following the 2010 heavy oil spill in Michigan’s Kalamazoo River, Congress ordered an audit that spotlighted the industry’s poor record of spotting leaks. *Politico* reported on the 2015 regulatory structure ultimately unveiled in response, determining the proposal “fails to patch that hole in the nation’s pipeline safety net.” “While the agency’s proposed rule expands the number of pipelines that must have a leak-detection system in place, it sets no basic standards for how well that technology should work. Instead, safety advocates say, it lets pipeline operators decide for themselves whether they are adequately prepared.”<sup>1139</sup>
- October 16, 2015 – The EPA urged FERC to consider “whether the Northeast Energy Direct pipeline could be combined with other projects, rather than constructing a new system that would have a host of environmental impacts,” reported Oneonta, New York’s *Daily Star*. The EPA also advised “that the gas demand addressed by NED’s application could be met by renewable forms of energy such as solar and wind power...”<sup>1140</sup> (Note: Kinder Morgan withdrew its NED pipeline application in April 2016.)
- September 17, 2015 – At a shale gas conference, industry representatives espoused the construction of new pipelines as necessary to re-invigorate the gas industry in the Marcellus. Speakers noted that FERC approval can be expected to now take longer, by about six months, blaming environmental groups for the delays.<sup>1141</sup>
- September 9, 2015 – New pipelines are failing at a rate on par with gas transmission lines installed before the 1940s, according to an analysis of federal data by the Pipeline Safety Trust, reported by *S&P Global Market Intelligence*. “The gas transmission lines installed in the 2010s had an annual average incident rate of 6.64 per 10,000 miles over the time frame considered, even exceeding that of the pre-1940s pipes. Those installed prior to 1940 or at unknown dates had an incident rate of 6.08 per 10,000 miles.” The director of the National Transportation Safety Board’s Office of Railroad, Pipeline and Hazardous Materials Investigations “agreed that the rapid construction of pipelines in the U.S. is likely a contributing factor.”<sup>1142</sup>
- August 18, 2015 – Houston Advanced Research Center (HARC) scientists addressed “the commonly acknowledged sources of uncertainty which are the lack of sustained monitoring of ambient concentrations of pollutants associated with gas mining, poor quantification of their emissions, and inability to correlate health symptoms with specific emission events.” They concluded that “more contemporary monitoring and data analysis techniques should take the place of older methods to better protect the health of nearby

<sup>1139</sup> Schor, E. (2015, November 9). The hole in Obama’s pipeline safety plan. *Politico*. Retrieved from <http://www.politico.com/story/2015/11/obama-pipeline-safety-plan-oil-215617>

<sup>1140</sup> Mahoney, J. (2015, October 16). EPA: Can local pipeline plans merge? *Daily Star*. Retrieved from [http://www.thedailystar.com/news/local\\_news/epa-can-local-pipeline-plans-merge/article\\_f2836510-a96b-5c2d-9892-755b94b1f640.html?mode=jqm](http://www.thedailystar.com/news/local_news/epa-can-local-pipeline-plans-merge/article_f2836510-a96b-5c2d-9892-755b94b1f640.html?mode=jqm)

<sup>1141</sup> Packel, D. (2015, September 17). Energy honchos lament FERC pipeline approval delays. *Law 360*. Retrieved from <http://www.law360.com/publicpolicy/articles/697120/energy-honchos-lament-ferc-pipeline-approval-delays>

<sup>1142</sup> Smith, S. (2015, September 9). As US rushes to build gas lines, failure rate of new pipes has spiked. *SNL Financial*. Retrieved from <https://www.snl.com/InteractiveX/Article.aspx?cdid=A-33791090-11060>

residents and maintain the integrity of the surrounding environment.” “Real-time mobile monitoring, microscale modeling and source attribution, and real-time broadcasting of air quality and human health data over the World Wide Web” have been demonstrated, they wrote, by past, current, and planned future monitoring studies in the Barnett and Eagle Ford shale regions.<sup>1143</sup> Founded as a technology incubator in 1982 by Houston oilman George P. Mitchell, HARC later re-aligned to focus on sustainable development.

- August 14, 2015 – HARC scientists found that port operations involving petrochemicals may significantly increase emissions of air toxics, including peaks of carcinogenic benzene of up to 37 ppb. The scientists matched the benzene spikes with pipeline systems. The spikes were at levels much higher than those reported in the EPA’s 2011 National Emissions Inventory. The authors recommended the use of updated methods for ambient monitoring.<sup>1144</sup> Lead scientist Jay Olaguer said in a related interview that “government regulators should wake up to the reality of the situation, that their methods of tracking air pollution need to be updated so that the samples are taken in real time and can catch it when toxic vapors of this magnitude are released.”<sup>1145</sup>
- July 15, 2015 – Rensselaer County lawmakers passed a resolution asking the state of New York to freeze the approval process for the Northeast Energy Direct pipeline—which would carry fracked gas from Pennsylvania to Boston—until it conducts a comprehensive health impact assessment for natural gas pipelines.<sup>1146</sup>
- July 8, 2015 – Researchers from West Virginia University completed leak and loss audits for methane emissions at three natural gas compressor stations and two natural gas storage facilities, with a “leak” defined as an unintended release of natural gas due to malfunction of a component, and a “loss” defined as an intended release of natural gas. In terms of frequency, most emissions were leaks, but on a mass basis, losses were the dominant source of methane emissions (88 percent). The top loss emitters were engine exhausts (accounting for nearly half), packing vents, and slop tanks. Emissions from compressor blowdowns were not included.<sup>1147</sup> A related study by a University of Houston

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<sup>1143</sup> Olaguer, E. P., Erickson, M., Wijesinghe, A., Neish, B., Williams, J., & Colvin, J. (2015). Updated methods for assessing the impacts of nearby gas drilling and production on neighborhood air quality and human health. *Journal of the Air & Waste Management Association*, 66, (2), 173-183. doi: 10.1080/10962247.2015.1083914

<sup>1144</sup> Olaguer, E. P., Erickson, M. H., Wijesinghe, A., & Neish, B. S. (2015). Source attribution and quantification of benzene event emissions in a Houston ship channel community based on real-time mobile monitoring of ambient air. *Journal of the Air & Waste Management Association*, 66, (2), 164-172. doi: 10.1080/10962247.2015.1081652

<sup>1145</sup> Wray, D. (2016, February 23). Scientists discover pipelines belching benzene in East Houston. *Houston Press*. Retrieved from <http://www.houstonpress.com/news/scientists-discover-pipelines-belching-benzene-in-east-houston-8181569>

<sup>1146</sup> Nearing, B. (2015, July 15). County: Put study before any permit. *Albany Times-Union*. Retrieved from <http://www.timesunion.com/news/article/County-Put-study-before-any-permit-6387404.php>

<sup>1147</sup> Johnson, D. R., Covington, A. N., & Clark, N. N. (2015). Methane emissions from leak and loss audits of natural gas compressor stations and storage facilities. *Environmental Science & Technology*, 49, 8132-8138. doi: 10.1021/es506163m



team found that emission rates from compressor stations in Texas' Barnett Shale were far higher than from well pads.<sup>1148, 1149</sup>

- July 7, 2015 – Seeking a method to bridge the gap between bottom-up and top-down methods of measuring methane emissions, Purdue University, University of Houston, the National Oceanic and Atmospheric Administration (NOAA), Environmental Defense Fund, and independent researchers surveyed eight high-emitting point sources in the Barnett Shale using an aircraft-based “mass balance” approach. Results from four gas processing plants and one compressor station highlighted the importance of addressing methane “super-emitters” and confirmed that self-reports from the Greenhouse Gas Reporting Program underestimated actual emission rates by a factor of 3.8 or higher, due to “underestimated facility emissions, temporal variability of emissions, and the exclusion of nonreporting facility emissions.”<sup>1150</sup>
- July 7, 2015 – Using relatively easy-to-acquire and inexpensive stable isotopic and alkane ratio tracers, researchers are now able to distinguish methane arising from natural gas production and transport from agricultural and urban methane sources, and, in addition, to distinguish between methane released from shale gas as opposed to conventional wells. Initial research from the University of Cincinnati, University of California at Irvine, and the Environmental Defense Fund found that methane in the Barnett Shale hydraulic fracturing region near Fort Worth, Texas, represents a complex mixture of these sources. This new approach, used for ground-level measurements, can complement and extend top-down approaches, allowing for more accurate inventories of thermogenic and biogenic sources of methane emissions.<sup>1151</sup>
- July 1, 2015 – In New York State, Schoharie County supervisors and medical professionals demanded comprehensive health impact assessments as a precondition for permitting natural gas pipelines and compressor stations.<sup>1152</sup>
- June 12, 2015 – The Agency for Toxic Substances and Disease Registry investigated the health effects of ruptured gas pipelines in an analysis of data in a database on acute petroleum-related releases to which seven states contribute (Louisiana, New York, North Carolina, Oregon, Tennessee, Utah, and Wisconsin). From 2010 to 2012, there were

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<sup>1148</sup> Lan, X., Talbot, R., Laine, P., & Torres, A. (2015). Characterizing fugitive methane emissions in the Barnett Shale area using a mobile laboratory. *Environmental Science & Technology*, 49, 8139-8146. doi: 10.1021/es5063055

<sup>1149</sup> Song, L., & Hirji, Z. (2015, July 8). Methane emissions in Texas fracking region 50 percent higher than EPA estimates. *InsideClimate News*. Retrieved from <http://insideclimatenews.org/news/08072015/methane-emissions-texas-fracking-region-50-higher-epa-estimates-oil-gas-drilling-barnett-shale-environmental-defense-fund>

<sup>1150</sup> Lavoie, T. N., Shepson, P. B., Cambaliza, M. O. L., Stirr, B. H., Karion, A., Sweeney, C., . . . Lyon, D. (2015). Aircraft-based measurements of point source methane emissions in the Barnett Shale Basin. *Environmental Science & Technology*, 49, 7904–7913. doi: 10.1021/acs.est.5b00410

<sup>1151</sup> Townsend-Small, A., Marrero, J. E., Lyon, D. R., Simpson, I. J., Meinardi, S., & Blake, D.R. (2015). Integrating source apportionment tracers into a bottom-up inventory of methane emissions in the Barnett Shale hydraulic fracturing region. *Environmental Science & Technology*, 49, 8175–8182. doi: 10.1021/acs.est.5b00057

<sup>1152</sup> Adams, K. (2015, July 1). Schoharie County officials ask new studies on gas lines: Report say dangers are equivalent to fracking. *Daily Gazette*, Retrieved from [http://www.dailygazette.com/news/2015/jul/01/0701\\_gasline/?print](http://www.dailygazette.com/news/2015/jul/01/0701_gasline/?print)

1,369 such incidents, which resulted in 259 injuries. More than three-quarters of these incidents were related to natural gas distribution. Equipment failure accounted for half of all incidents; human error accounted for 40 percent. The report noted the “continuing occurrence” of petroleum release incidents—including from natural gas pipeline ruptures—which have “the potential to cause mass casualties and environmental contamination.”<sup>1153</sup>

- June 9, 2015 – The American Medical Association (AMA) adopted a resolution, “Protecting Public Health from Natural Gas Infrastructure,” that was based on a resolution adopted by the Medical Society of the State of New York. (See below.) The resolution states, “Our AMA recognizes the potential impact on human health associated with natural gas infrastructure and supports legislation that would require a comprehensive Health Impact Assessment regarding the health risks that may be associated with natural gas pipelines.”<sup>1154</sup>
- May 2, 2015 – The Medical Society of the State of New York adopted a resolution, “Protecting Public Health from Natural Gas Infrastructure,” that recognizes the potential impact to human health and the environment of natural gas pipelines and calls for a governmental assessment of these risks.<sup>1155</sup>
- March 3, 2015 – Researchers with the Southwest Pennsylvania Environmental Health Project measured ambient levels of particulate and volatile air pollutants from fracking-related operations and calculated expected human exposures in Washington County, Pennsylvania. Extremely high exposures peaked at night when air was still. These fluctuating exposure events mimic, in frequency and intensity, the episodic nature of health complaints among residents. Over a one-year period, compressor stations were responsible for more extreme exposure events (118) than well pads or gas processing plants.<sup>1156</sup>
- February 24, 2015 – As part of a literature review on the health impacts of compressor stations, the Southwest Pennsylvania Environmental Health Project reported that peak emissions of fine particles tended to occur during construction time, that day-to-day emissions during operational time can fluctuate greatly, and that a compressor blowdown typically represented the single largest emission event during operations. Hence, documentation of these fluctuations cannot be captured by calculating yearly averages. A blowdown is an intentional or accidental release of gas through the blowdown valve that

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<sup>1153</sup> Anderson, A. R. (2015, June 12). Health effects of cut gas lines and other petroleum product release incidents—seven states. *Morbidity and Mortality Weekly Report*, 64, 601-605.

<sup>1154</sup> American Medical Association. (2015). H-135.930 Protecting public health from natural gas infrastructure, Resolution 519, A-15. Retrieved from <https://www.ama-assn.org/sites/default/files/media-browser/public/hod/a15-hod-resolutions.pdf>

<sup>1155</sup> Medical Society of the State of New York. (2015). 2015 House of Delegates Actions: Public Health and Education. Retrieved from <http://www.mssny.org/Documents/HOD/Actions/ActionPHE.pdf>

<sup>1156</sup> Brown, D. R., Lewis, C., & Weinberger, B. I. (2015). Human exposure to unconventional natural gas development: a public health demonstration of periodic high exposure to chemical mixtures in ambient air. *Journal of Environmental Science and Health, Part A: Toxic/Hazardous Substances and Environmental Engineering*, 50, 460-72. doi: 10.1080/10934529.2015.992663

creates a 30- to 60-meter-high gas plume. Blowdowns, which are used to release pressure, can last as long as three hours. The authors noted that blowdowns result in periods of high levels of volatile organic compound releases and that anecdotal accounts associate blowdowns with burning eyes and throat, skin irritation, and headache.<sup>1157</sup> There is neither a national or state inventory of compressor station accidents nor a body of peer-reviewed research on the public health impacts of compressor stations.

- February 17, 2015 – A Boston study found that emissions from residential, end-use natural gas infrastructure was a significant source of atmospheric methane—two to three times larger than previously presumed—and accounted for 60 to 100 percent of methane, depending on the season. Of all the natural gas in the downstream component of the natural gas system, 2.7 percent was lost to the atmosphere.<sup>1158</sup>
- February 10, 2015 – A team of engineers from Pennsylvania and Colorado examined methane emissions from natural gas compressor stations and found that vents, valves, engine exhaust, and equipment leaks were also major emissions sources. There was considerable variation in emissions among the 45 compressor stations measured. Surprisingly, substantial emissions were found even when compressors were not operating.<sup>1159</sup>
- December 27, 2014 – A *Pittsburgh Tribune-Review* investigation found that the vast majority of natural gas “gathering lines”—pipelines that take natural gas from rural well pads to processing plants—were regulated by neither federal nor state pipeline safety laws. The United States has nearly 230,000 miles of natural gas gathering lines that are unregulated, operating without safety standards or inspection. These pipelines are among the largest and highest-pressure pipes in use and carry gas at nearly three times the pressure of transmission lines, which transport the gas from the processing plants to urban distribution networks.<sup>1160</sup>
- November 11, 2014 – An analysis by a Carnegie Mellon University research team of 40,000 pipeline accidents from 1968 to 2009 found that comparatively few accidents accounted for a large share of total property damage, whereas a large share of fatalities and injuries were caused by numerous, small-scale accidents. There are 2.4 million miles

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<sup>1157</sup> Southwest Pennsylvania Environmental Health Project (2015, February 24). Summary on compressor stations and health impacts. Retrieved from <http://www.environmentalhealthproject.org/wp-content/uploads/2012/03/Compressor-station-emissions-and-health-impacts-02.24.2015.pdf>

<sup>1158</sup> McKain, K., Down, A., Raciti, S. M., Budney, J., Hutyra, L. R., Floerchinger, C., . . . Wofsy, S.C. (2015). Methane emissions from natural gas infrastructure and use in the urban region of Boston, Massachusetts. *Proceedings of the National Academy of Sciences*, 112, 1941-46. doi: 10.1073/pnas.1416261112

<sup>1159</sup> Subramanian, R., Williams, L. L., Vaughn, T. L., Zimmerle, D., Roscioli, J. R., Herndon, S. C., . . . Robinson, A.L. (2015). Methane emissions from natural gas compressor stations in the transmission and storage sector: measurements and comparisons with the EPA Greenhouse Gas Reporting Program protocol. *Environmental Science & Technology*, 49, 3252-61. doi: 10.1021/es5060258

<sup>1160</sup> Wereschlagin, M. (2015, December 27). Rural gas gathering pipelines kindle concerns about safety laws. *Pittsburgh Review-Tribune*. Retrieved from <http://triblive.com/news/editorspicks/7362085-74/lines-gas-safety#axzz3NAHfzYF8>

of natural gas pipeline in the United States and 175,000 miles of hazardous liquid pipeline (which includes crude oil).<sup>1161</sup>

- October 30, 2014 – A research team led by David O. Carpenter at University at Albany found high levels of formaldehyde near 14 compressor stations in three states. In Arkansas, Pennsylvania, and Wyoming, formaldehyde levels near compressor stations exceeded health-based risk levels. The authors noted that compressor stations can produce formaldehyde through at least two routes: it is created as an incomplete combustion byproduct from the gas-fired engines used in compressor stations. It is also created when fugitive methane, which escapes from compressor stations, is chemically converted in the presence of sunlight. Formaldehyde is a known human carcinogen. Other hazardous air pollutants detected near compressor stations in this study were benzene and hexane. One air sample collected near a compressor station in Arkansas contained 17 different volatile compounds. (See entry for October 30, 2014 in Air Pollution.)
- October 15, 2014 – In comments to FERC, New York’s Madison County Health Department reviewed the literature on compressor station emissions and expressed concerns about associated health impacts, including documented correlations between health problems and residential proximity to compressor stations. It also reviewed health outcomes associated with exposures to chemicals known to be released from compressor stations, including VOCs, carbonyls and aldehydes, aromatics, and particulate matter. In addition, gas from fracking operations transiting through compressor stations may carry gaseous radon. The Health Department noted a troubling lack of information on the intensity, frequency, and duration of emission peaks that occur during the blowdowns and large venting episodes that are a normal part of compressor operations.<sup>1162</sup>
- September 16, 2014 – Noting the proximity of a proposed high-pressure pipeline to Indian Point Nuclear Facility, as well as the evidence linking compressor station emissions to negative health impacts, New York’s Rockland County legislature adopted a resolution calling for a comprehensive Health Impact Assessment in regards to Spectra Energy’s planned Algonquin Incremental Market (AIM) natural gas pipeline, compressor, and metering stations expansion project.<sup>1163</sup> This resolution follows on the heels of similar resolutions expressing health concerns about the AIM project from both Westchester and Putnam County legislatures.<sup>1164, 1165</sup>

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<sup>1161</sup> Siler-Evans, K., Hanson, A., Sunday, C., Leonard, N., & Tumminello, M. (2014). Analysis of pipeline accidents in the United States from 1968 to 2009. *International Journal of Critical Infrastructure Protection*, 7, 257-69. doi: 10.1016/j.ijcip.2014.09.002

<sup>1162</sup> New York State Madison County Health Department (2014, October 15). Comments to the Federal Energy Regulatory Committee concerning docket no. CP14-497-000, Dominion Transmission, Inc. Retrieved from [https://www.madisoncounty.ny.gov/sites/default/files/publicinformation/madison\\_county\\_doh\\_comments\\_-\\_docket\\_no.\\_cp14-497-000.pdf](https://www.madisoncounty.ny.gov/sites/default/files/publicinformation/madison_county_doh_comments_-_docket_no._cp14-497-000.pdf)

<sup>1163</sup> Rockland County Legislature. (2014, September 16). *Resolution No. 404 of 2014 urging that health, safety and planning concerns be addressed and mitigated in the Environmental Review and all other review processes before project permissions be granted for Spectra Energy's Algonquin Incremental Market (AIM) Natural Gas Pipeline, Compressor and Metering Stations Expansion Project*. Retrieved from <https://sape2016.files.wordpress.com/2014/05/rockland-aim-resolution.pdf>

<sup>1164</sup> Board of Legislators County of Westchester, State of New York. (2014, July 21). *Resolution RES-2014-80*

- January 24, 2013 – A report prepared for the Clean Air Council by an independent consulting firm to evaluate air quality impacts from the Barto Compressor Station in Penn Township, Lycoming County, Pennsylvania predicted “large exceedances” of the nitrogen dioxide (NO<sub>2</sub>) 1-hour NAAQS. Researchers used allowable emissions in the PA DEP permit, the 2006-2010 meteorological data and the latest EPA modeling guidance for the model’s prediction. Three techniques were used, and for two of the techniques, NAAQS exceedances occurred within a mile of the plant. The report concluded, “NO<sub>2</sub> impacts from the Barto plant alone are very significant since its emissions cause large exceedances of the 1-hour NAAQS.”<sup>1166</sup>
- July 13, 2011 – A Fort Worth air quality study assessed the impact of drilling and fracking operations, and ancillary infrastructure, on concentrations of toxic air pollutants in the city of Fort Worth, Texas. The study found that compressor stations were a significant source of fracking-related air pollution. The compressor engines were responsible for over 99 percent of the hazardous air pollutants emitted from compressor stations, of which 67 percent was formaldehyde.<sup>1167</sup>

## **Gas storage**

*Gas storage facilities include not only manmade holding tanks but also geological formations, most notably, aquifers, abandoned salt caverns, and depleted oil fields left over from mining and drilling operations. These unlined cavities were not created with the intent to store pressurized hydrocarbon gases, nor are they engineered for this purpose. The 3,600-acre Aliso Canyon gas storage facility, located in a depleted oil field in southern California, released more than 100,000 metric tons of methane into the air of the San Fernando Valley over a four-month period beginning in October 2015 before it was finally contained in February 2016. This massive methane leak—the largest in U.S. history—is the greenhouse gas equivalent of a half million cars driving for a year. The plume itself was visible from space. More than 8,000 families in the nearby community of Porter Ranch were evacuated and*

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Algonquin Incremental Marketing Project resolution. Retrieved from <https://sape2016.files.wordpress.com/2014/05/080414-wcbol-resolution-no-80-2014-requesting-due-diligence-on-environment-p.pdf>

<sup>1165</sup> Putnam County Legislature. (2014, May 9). *Resolution #104, Resolution regarding the Algonquin Incremental Market (AIM) Project*. Retrieved from <https://sape2016.files.wordpress.com/2014/05/putnam-county-resolutions-104-163-and-182-1.pdf>

<sup>1166</sup> Tran, K. T. (2013, January 24). *AERMOD modeling of NO<sub>2</sub> impacts of the Barto Compressor Station: Final report*. Prepared for the Clean Air Council, Philadelphia, PA. Retrieved from [http://www.pennfuture.org/UserFiles/File/MineDrill/Marcellus/CAC\\_EmissionsNO2\\_CompressorBarto\\_20130124.pdf](http://www.pennfuture.org/UserFiles/File/MineDrill/Marcellus/CAC_EmissionsNO2_CompressorBarto_20130124.pdf)

<sup>1167</sup> Eastern Research Group. (2011, July 13). City of Fort Worth natural gas air quality study, final report. Retrieved from

<http://www.shaledigest.com/documents/2011/Air%20Quality%20Studies/Ft%20Worth%20Natural%20Gas%20Air%20Quality%20Study%20Final%20Report%20ERG%20Research%207-13-2011r.pdf>. See also Energy Research Group. (2011, July 19). Fort Worth natural gas air quality study final report, public meeting presentation. Retrieved from [http://fortworthtexas.gov/uploadedFiles/Gas\\_Wells/110719\\_ERG.pdf?v=110725](http://fortworthtexas.gov/uploadedFiles/Gas_Wells/110719_ERG.pdf?v=110725)

*relocated, thousands were sickened, and two public schools closed. The immediate cause of the Aliso Canyon blowout was a cracked well casing and lack of a shut-off valve. Data released in 2018 as part of a new U.S. Department of Transportation rule reveal that there are more than 10,000 Aliso-style storage wells with gas flowing through only a single unprotected pipe—that is, with a single point of failure. Of the nearly 400 natural underground storage facilities in the United States, 296 of them have one or more of these wells, and they are located in 32 states.*

- February 1, 2019 – An assessment of gas leakage from different types of natural gas storage facilities that established a mathematical model to predict leakage points showed that long-term periodic injection of gas and improper construction will lead to some degree of gas leakage risks, no matter what kind of construction process is used to create the gas storage reservoir.<sup>1168</sup>
- January 2, 2019 – Plans by Alton Natural Gas to create a massive gas storage hub in salt caverns north of Halifax, Nova Scotia were delayed due to “project and regulatory planning,” and the company has asked the Nova Scotia Utility and Review Board to extend its cavern construction permit. The plan involves hollowing out underground salt deposits using water from the tidal Shubenacadie River. The brine waste would then be dumped into the river, twice a day at high tide, over a two- to three-year period. Members of the Sipekne’katik First Nation argue that the project will harm the ecology of the tidal river, which runs through the middle of Nova Scotia. They have continuously occupied and protested at the site since 2014.<sup>1169</sup>
- August 20, 2018 – A research team investigated the geomechanics of an underground natural gas storage facility in China. They noted that geological factors and engineering factors can both contribute to leaks. Engineering factors include problems with casing integrity, cementing quality, and salt cavern operating pressure. Geological factors include challenges posed by the complexity of geological formations, imperfect sealing by the caprock, and the presence of faults. Using geological analysis, permeability tests, and CT scans, the authors determined that the risk of leakage in this salt cavern underground gas storage arises mainly from a failure of wellbore tightness within a mudstone interlayer.<sup>1170</sup>
- July 12, 2018 – The New York State Department of Environmental Conservation denied a permit for liquified petroleum gas storage (propane) in abandoned salt caverns on the shoreline of Seneca Lake. “The record demonstrates that the impacts of this project on

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<sup>1168</sup> Wei, X., & Zhichao, Z. (2019). Study on the production mode and leakage risk of gas storage well completion. *IOP Conference Series: Earth and Environmental Science*, 233(4), 042007. doi: 10.1088/1755-1315/233/4/042007

<sup>1169</sup> The Canadian Press. (2019, January 2). More delays for underground cavern gas storage plan north of Halifax. *ConstructConnect*. Retrieved from <https://canada.constructconnect.com/dcn/news/resource/2019/01/delays-underground-cavern-gas-storage-plan-north-halifax>

<sup>1170</sup> Chen, X., Li, Y., Liu, W., Ma, H., Ma, J., Shi, X., & Yang, C. (2019). Study on sealing failure of wellbore in bedded salt cavern gas storage. *Rock Mechanics and Rock Engineering*, 52(1), 215–228. Advance online publication. doi: 10.1007/s00603-018-1571-5

the character of the local and regional community, including but not limited to the environmental setting and sensitivity of the Finger Lakes area and the local and regional economic engines (e.g., wine, agricultural and tourism industries), are significant and adverse and the project does not avoid or minimize those impacts to the maximum extent practicable. Furthermore, the significant adverse impacts on community character are not outweighed or balanced by social, economic or other considerations, and cannot be avoided or minimized to the maximum extent practicable by the proposed mitigation measures.” Concerns were also raised about the structural integrity of the caverns following disclosure by the gas storage company that additional pressure testing in the caverns would be required to assess possible leaks.<sup>1171, 1172</sup> The previous year, a subsidiary of the same company scrapped a parallel plan to expand the storage of natural gas in adjacent salt caverns along the lake shore.<sup>1173</sup>

- June 22, 2018 – A research team undertook an analysis to determine why the roof of China’s first salt cavern underground gas storage facility collapsed, as determined by a sonar test after just 1.3 years of use. They concluded that the main reasons for the collapse were the large-span flat roof, a too-rapid decrease in internal gas pressure, and localized damage that led to massive collapse. They also concluded that this cavern has a high risk of roof collapse taking place again. The study includes evaluations of other similar incidents worldwide. Using geomechanical modeling, the authors developed a “new failure prediction index, consisting of volume shrinkage, dilatancy safety factors, displacement, vertical stress, and equivalent strain.”<sup>1174</sup>
- May 4, 2018 – A new Department of Transportation rule requires gas companies that operate storage facilities to disclose information about design, leaks, and repairs of their wells. According to data released on April 4, 2018 as part of this rule, more than 10,000 wells have gas flowing through only a single unprotected pipe—that is, with a single point of failure. Of the nearly 400 natural underground storage facilities in the United States, 296 of them have one or more of these wells, and they are in 32 states.<sup>1175</sup> These statistics update an earlier estimate by Harvard University researcher Drew Michanowicz,

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<sup>1171</sup> State of New York Department of Environmental Conservation. (2018, July 12). Decision of the Commissioner, final supplemental environmental impact statement and SEQRA findings statement. Retrieved from <https://www.dec.ny.gov/hearings/114139.html>

<sup>1172</sup> Platsky, J. (2018, May 23). Crestwood acknowledges possible leaks in proposed LPG storage in Seneca Lake mines. *Ithaca Journal*. Retrieved from <https://eu.pressconnects.com/story/news/local/2018/05/21/crestwood-seneca-lake-gas-storage/629768002/>

<sup>1173</sup> Campbell, J. (2018, July 12). Crestwood’s Seneca Lake propane storage facility rejected by DEC. *Ithaca Journal*. Retrieved from <https://www.pressconnects.com/story/news/2018/07/12/dec-rejects-plan-crestwood-propane-storage-facility-seneca-lake/779605002/>

<sup>1174</sup> Wang, T., Yang, C., Chen, J., & Daemen, J. J. K. (2018). Geomechanical investigation of roof failure of China’s first gas storage salt cavern. *Engineering Geology*, 243, 59-69. doi: 10.1016/j.enggeo.2018.06.013

<sup>1175</sup> U.S. Department of Transportation, Pipelines and Hazardous Materials Safety Administration. (2018). Gas distribution, gas gathering, gas transmission, hazardous liquids, liquefied natural gas (LNG), and underground natural gas storage (UNGS) annual report data. Retrieved from <https://www.phmsa.dot.gov/data-and-statistics/pipeline/gas-distribution-gas-gathering-gas-transmission-hazardous-liquids>

who, consulting earlier databases, had pegged the number of Aliso-type wells at about 2,700.<sup>1176</sup> (See also entry for May 24, 2017.)

- March 6, 2018 – Illinois has the largest amount of natural gas storage in salt formations in the nation. Some of these storage sites underlie the Mahomet Aquifer, which provides drinking water for 14 counties in east-central Illinois. Prompted by an October 2016 report by a federal task force in the aftermath of California’s Aliso Canyon natural gas leak, a team from the University of Illinois’ Prairie Research Institute created an introductory guide to provide basic information about the Mahomet Aquifer and natural gas storage in east-central Illinois.<sup>1177</sup> (See also entry for October 18, 2016.)
- January 18, 2018 – The California Council of Science and Technology released a 910-page report analyzing the safety risks of all 14 facilities in the state that store gas in depleted oil fields. Among its findings: gas companies do not disclose the chemicals that are pumping underground; state regulators lack necessary information to assess risks; and many wells servicing the storage fields are 60 to 90 years old with no regulatory limit to the age of the well.<sup>1178</sup>
- December 1, 2017 – A University of Southern California-led team investigated the roots causes of the catastrophic Aliso Canyon gas storage blow-out, which began October 23, 2015 and continued for four months before being contained. Using methodology designed to capture both social and technological factors, the team concluded that corporate dysfunction and lack of government oversight were the driving forces responsible for the accident. “Risk analysis is vital for safe well operations and relies on analyzing prior data records, yet no national standards for well records were in place prior to the accident. There was no clear overarching agency that was in control of the accident’s intervention and aftermath.”<sup>1179</sup> In a subsequent news piece from the university, Najmedin Meshkati, senior author of the study, said, “SoCal Gas had lenient requirements for infrastructure record keeping, no comprehensive risk management plan, and no testing programs or plans in place to remediate substandard wells. The company needs to improve its safety culture.”<sup>1180</sup>

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<sup>1176</sup> Michanowicz, D. (2018, May 14). The Aliso Canyon gas leak was a disaster. There are 10,000 more storage wells out there just like it. *Los Angeles Times*. Retrieved from <http://www.latimes.com/opinion/op-ed/la-oe-michanowicz-aliso-canyon-gas-leak-20180514-story.html>

<sup>1177</sup> Locke, R., Roadcap, G., Stumpf, A., Leetaru, H., Kelly, W., & Winkel, R. (2018). *An introductory guide to the Mahomet Aquifer and natural gas storage in East-Central Illinois*. Prairie Research Institute. Retrieved from [https://www.ideals.illinois.edu/bitstream/handle/2142/99145/PRI%20Intro%20Guide%20to%20the%20Mahomet%20Aquifer%20and%20Natural%20Gas%20Storage\\_02.22.2018\\_printed.pdf?sequence=2&isAllowed=y](https://www.ideals.illinois.edu/bitstream/handle/2142/99145/PRI%20Intro%20Guide%20to%20the%20Mahomet%20Aquifer%20and%20Natural%20Gas%20Storage_02.22.2018_printed.pdf?sequence=2&isAllowed=y)

<sup>1178</sup> Birkholzer, J., & Long, J. C. S. (2018, January 18). *Long-term viability of underground natural gas storage in California: an independent review of scientific and technical information*. California Council of Science and Technology. Retrieved from <https://ccst.us/reports/natural-gas-storage/>

<sup>1179</sup> Tabibzadeh, M., Stavros, S., Ashtekar, M. S., & Meshkati, N. (2017). A systematic framework for root-cause analysis of the Aliso Canyon Gas Leak using the AcciMap methodology: Implication for underground gas storage facilities. *Journal of Sustainable Energy Engineering*, 5(3). doi: 10.7569/JSEE.2017.629515

<sup>1180</sup> Vuong, Z. (2018, February 15). Who should be held responsible for the Aliso Canyon gas leak? *USC News*. Retrieved from <http://news.usc.edu/136300/who-should-be-held-responsible-for-the-aliso-canyon-gas-leak/>



- November 22, 2017 – The U.S. Government Accountability Office (GAO) reported that, two years after the Aliso Canyon blow-out, the Pipeline and Hazardous Materials Safety Administration (PHMSA) is failing to inspect natural gas storage sites in a timely manner, as called for by the Department of Transportation’s interim standards. Until 2016, states set the standards for 211 of the nation’s 415 gas storage sites, while the 204 sites that were connected to interstate pipelines had no standards at all. Collectively, these 415 natural gas storage sites contain about 17,000 wells that inject or withdraw natural gas from the underground formations below, which include depleted oil and gas reservoirs, abandoned mines, depleted aquifers, and hard rock caverns. The GAO noted that more than 300 cities and towns are located near natural gas storage sites.<sup>1181</sup>
- June 21, 2017 – In response to requests from the oil and natural gas industry, the White House announced that it will delay implementation of a rule that would have set national standards for underground natural gas storage. Prompted by the 2015 disaster at Aliso Canyon and developed under the previous administration, this federal interim rule had called for phasing out single-point-of-failure, single-containment designs of the type that made impossible the task of swiftly shutting off the impaired Aliso Canyon well once it began leaking.<sup>1182</sup>
- May 24, 2017 – A national assessment of thousands of underground gas storage wells by a Harvard School of Public Health team found that more than 20 percent are similar in design to the well that failed at Aliso Canyon. These obsolete wells, with single failure points and a median age of 74 years, operate in 19 states and represent more than half of the working capacity for U.S. natural gas. More than 2,700 of these wells were not originally designed to hold gas and, as at Aliso Canyon, have been repurposed to do so. An estimated 210 of these repurposed wells (located in Pennsylvania, Ohio, New York, and West Virginia) are more than 100 years old and entirely lack cement zonal isolation methods. Study author Jonathan Buonocore said, “Partly because no federal safety regulations apply to natural gas storage wells or their operations (now pending), very little aggregate information was available. . . . After we identified this data gap, we realized we needed to build our own database to begin to assess this previously inapparent hazard.” With the 50 percent increase in domestic natural gas production over the last ten years, natural gas storage is at an all time high and in demand.<sup>1183, 1184</sup>

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<sup>1181</sup> U.S. Government Accountability Office. (2017, November 22). *Natural gas storage: Department of Transportation could take additional steps to improve safety enforcement planning*. GAO-18-89. Retrieved from <https://www.gao.gov/assets/690/688553.pdf>.

<sup>1182</sup> Nemec, R. (2017, June 21). PHMSA pauses stricter natural gas storage rules for clarification. *Natural Gas Intel*. Retrieved from <http://www.naturalgasintel.com/articles/110856-phmsa-pauses-stricter-natural-gas-storage-rules-for-clarification>

<sup>1183</sup> Michanowicz, D. R., Buonocore, J. J., Rowland, S. T., Konschnik, K. E., Goho, S. A., & Bernstein, A.S. (2017). A national assessment of underground gas storage identifying wells with designs likely vulnerable to a single-point-of-failure. *Environmental Research Letters*, 12(6). doi: 10.1088/1748-9326/aa7030

<sup>1184</sup> Institute of Physics. (2017, May 24). Study uncovers widespread leak risk for US underground natural gas storage wells. *Phys.Org*. Retrieved from <https://phys.org/news/2017-05-uncovers-widespread-leak-underground-natural.html>

- October 21, 2016 – The California Air Resources Board determined that the Aliso Canyon gas storage facility released 100,000 tons of methane, becoming the largest ever natural gas leak in U.S. history.<sup>1185</sup>
- October 18, 2016 – A federal task force issued a report with 44 recommendations intended to prevent another Aliso Canyon-style disaster. Chief among them is a phase-out of “single-point of failure” designs.<sup>1186</sup>
- July 13, 2016 – As reported by the *Los Angeles Daily News*, Los Angeles County health officials were prepared to go to court to ensure that the Southern California Gas Company complies with an order to pay for professional comprehensive cleaning in the homes of residents who were relocated due to the Aliso Canyon gas leak. The company had filed legal papers asking that the order “to remove dust and oily mist from up to 35,000 homes be nullified,” after their report of having cleaned 1,700 homes to date. The Los Angeles County Health Department said the company had done a poor job on these and did not follow protocol to remove the metal particles, including barium, manganese, vanadium, aluminum, and iron previously identified in household surface dust.<sup>1187</sup>
- July 9, 2016 – California’s South Coast Air Quality Management District and Southern California Gas Company were still at an impasse seven months after the company was given an abatement order that included a community health study on the potential impacts of exposures from the massive Aliso Canyon leak. The company was ordered to commit to paying “reasonable costs” for the study.<sup>1188</sup>
- June 22, 2016 – The first federal legislation of gas storage facilities was signed into law. The Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2016 includes a provision in response to the Aliso Canyon gas leak requiring PHMSA to develop regulations for the construction and operation of underground natural gas storage facilities.<sup>1189</sup> (See entry below, of February 8, 2016, for analysis of the likely shortcomings of these first federal regulations and their inability to prevent a leak such as that at Aliso Canyon.)

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<sup>1185</sup> California Air Resources Board. (2016, October 21). Determination of total methane emissions from Aliso Canyon natural gas leak incident. Retrieved from

[https://www.arb.ca.gov/research/aliso\\_canyon/aliso\\_canyon\\_methane\\_emissions-arb\\_final.pdf](https://www.arb.ca.gov/research/aliso_canyon/aliso_canyon_methane_emissions-arb_final.pdf)

<sup>1186</sup> U.S. Department of Energy and U.S. Department of Transportation’s Pipeline and Hazardous Materials Safety Administration. (2016, October 18). Ensuring safe and reliable underground natural gas storage: Final report of the interagency task force on natural gas storage safety. Retrieved from

<https://energy.gov/sites/prod/files/2016/10/f33/Ensuring%20Safe%20and%20Reliable%20Underground%20Natural%20Gas%20Storage%20-%20Final%20Report.pdf>

<sup>1187</sup> Abram, S. (2016, July 13). SoCalGas slammed for poor cleanup of Porter Ranch homes. *Los Angeles Daily News*. Retrieved from <http://www.dailynews.com/health/20160713/socalgas-slammed-for-poor-cleanup-of-porter-ranch-homes>

<sup>1188</sup> Bartholomew, D. (2016, July 9). Gas Company, pollution agency at odds over cost of Porter Ranch health study. *Los Angeles Daily News*. Retrieved from <http://www.dailynews.com/government-and-politics/20160709/gas-company-pollution-agency-at-odds-over-cost-of-porter-ranch-health-study>

<sup>1189</sup> Cama, T. (2016, June 22). Obama signs pipeline safety bill. *The Hill*. Retrieved from <http://thehill.com/policy/energy-environment/284479-obama-signs-pipeline-safety-bill>

- June 20, 2016 – As reported in *Geophysical Research Letters*, an airborne instrument onboard a NASA satellite was able to detect and quantify the size and shape of the methane plume from the Aliso Canyon gas leak as the event occurred.<sup>1190</sup> This is the first time a natural gas leak has been visible from space, according to the authors of the study.<sup>1191</sup>
- May 4, 2016 – Southern California Gas Company said that costs related to the Aliso Canyon natural gas storage facility leak reached an estimated \$665 million. The utility company let the Securities and Exchange Commission know they carry policies with a combined limit available “in excess of \$1 billion,” but according to the *Los Angeles Times*, legal experts and lawyers said that \$1 billion in insurance might not be enough for what they ultimately need.<sup>1192</sup>
- April 12, 2016 – California energy agencies issued a report indicating the threat of widespread summer power outages if no gas can be withdrawn from Aliso Canyon. The report was met with criticism. “Consumer groups and utility critics contend that the blackout warnings are an irresponsible scare tactic to ensure that Southern California Gas Company is allowed to keep storing gas at the facility and that ratepayers will pay for upgrades to store even more fuel there.”<sup>1193</sup>
- April 6, 2016 – The *Los Angeles Times* reported that, though prices for homes in Porter Ranch adjacent to the Aliso Canyon gas storage leak held up, sales declined. After the leak that began October 23, 2015, sales from December 2015 to February 2016 declined 20 percent from the year before. Disclosures for homes in the area “now include a mention of the community's proximity to the gas field and the recent problems.”<sup>1194</sup>
- March 18, 2016 – The California State Oil and Gas Division of the Department of Conservation issued penalties totaling \$75,000 for three separate violations after finding incidents of intentional venting of gas at the Aliso Canyon gas field and malicious concealment of those acts. Both are violations of the state gas regulations.<sup>1195</sup> Following the Aliso Canyon gas storage leak, the California State Public Utilities Commission ordered a statewide survey of California’s 12 natural gas storage fields and found 229

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<sup>1190</sup> Thompson, D. R., Thorpe, A. K., Frankenberg, C., Green, R. O., Duren, R., Guanter, L., ...Ungar, S. (2016). Space-based remote imaging spectroscopy of the Aliso Canyon CH<sub>4</sub> superemitter. *Geophysical Research Letters* 43(12). doi: 10.1002/2016GL069079

<sup>1191</sup> Mooney, C. (2016 June 15). This gas leak was so massive that NASA saw it from space. *The Washington Post*. Retrieved from [https://www.washingtonpost.com/news/energy-environment/wp/2016/06/15/this-gas-leak-was-so-massive-that-nasa-saw-it-from-space/?utm\\_term=.1e66d8da1423](https://www.washingtonpost.com/news/energy-environment/wp/2016/06/15/this-gas-leak-was-so-massive-that-nasa-saw-it-from-space/?utm_term=.1e66d8da1423)

<sup>1192</sup> Penn, I. (2016, May 4). Costs related to Aliso Canyon leak reach an estimated \$665 million. *Los Angeles Times*. Retrieved from <http://www.latimes.com/business/la-fi-aliso-canyon-costs-20160504-snap-story.html>

<sup>1193</sup> Penn, I. (2016, April 12). 'This is a threat. This is not a report.' Critics call blackout warnings a scare tactic to keep Aliso Canyon open. *Los Angeles Times*. Retrieved from <http://www.latimes.com/business/la-fi-gas-field-20160412-story.html>

<sup>1194</sup> Khouri, A. (2016, April 6). Gas leak disrupts Porter Ranch housing market. *Los Angeles Times*. Retrieved from <http://www.latimes.com/business/realestate/la-fi-porter-ranch-sales-20160406-story.html>

<sup>1195</sup> California Department of Conservation. (2016, March 18). State oil & gas division issues \$75,000 fine to operator for illegally venting natural gas. NR#2016-06. Retrieved from [http://www.conservation.ca.gov/index/Documents/2016-06%20DOC%20fines%20oil%20operator%20\\$75,000.pdf](http://www.conservation.ca.gov/index/Documents/2016-06%20DOC%20fines%20oil%20operator%20$75,000.pdf)

faulty valves, flanges and leaky wellheads and a 230th leak at an abandoned well; eight were deemed hazardous.<sup>1196</sup>

- March 14, 2016 – Methane and ethane emissions were measured to determine spatial patterns and source attribution of urban methane in the Los Angeles Basin. The surveys demonstrated the prevalence of fugitive methane emissions across the Los Angeles urban landscape and that fossil fuel sources accounted for 58–65 percent of methane emissions.<sup>1197</sup>
- February 25, 2016 – Measurements of methane and other chemicals were taken by aerial equipment following the October gas release from a faulty well in the Aliso Canyon storage field. The data demonstrated that the blowout of this single well created the largest known anthropogenic point source of methane in the United States. The leak lasted 112 days and released a total of 97,100 tons of methane and 7,300 tons of ethane into the atmosphere. This was equal to 24 percent of the methane and 56 percent of the ethane emitted each year from all other sources in the Los Angeles Basin combined.<sup>1198</sup> Aliso Canyon was already a major pollution source before the massive leak.<sup>1199</sup> As determined by the study and reported by major news outlets, the recent methane leak is officially the worst in U.S. history.<sup>1200, 1201</sup>
- February 18, 2016 – Stanford and UCLA scientists reported to *InsideClimate News* that the lack of measurement data for the entire 100+ days of community exposures to the Aliso Canyon methane leak, combined with gaps in the science about many of the chemicals, hinders the ability to understand the health impacts of the leak. “‘The first week is when we would expect the highest gas concentrations to reach the neighborhood because the pressures in the storage field were the highest,’ said Robert Jackson, an earth system science professor at Stanford University who measured methane concentrations in nearby communities during the leak. ‘And yet we don’t have any information or data for

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<sup>1196</sup> St. John, P. (2016, March 23). 229 leaks found in state’s underground gas storage facilities, most considered minor. *Los Angeles Times*. Retrieved from

<http://www.latimes.com/local/lanow/la-me-ln-gas-leaks-storage-wells-20160322-story.html>

<sup>1197</sup> Hopkins, F. M., Kort, E. A., Bush, S. E., Ehleringer, J. R., Lai, C.-T., Blake, D. R., & Randerson, J. T. (2016). Spatial patterns and source attribution of urban methane in the Los Angeles Basin. *Journal of Geophysical Research: Atmospheres*, 121(5), 2490–2507. doi: 10.1002/2015JD024429

<sup>1198</sup> Conley, S., Franco, G., Faloon, I., Blake, D. R., Peischl, J. & Ryerson, T. B. (2016). Methane emissions from the 2015 Aliso Canyon blowout in Los Angeles, CA. *Science*. Advance online publication. doi: 10.1126/science.aaf2348

<sup>1199</sup> Lobet, I. & Reicher, M. (2016, February 14). *inewssource.org*. Retrieved from <http://inewssource.org/2016/02/14/aliso-canyon-major-pollution/>

<sup>1200</sup> Akpan, N. (2016, February 25). Los Angeles methane leak was officially the worst in U.S. history, study says. *PBS Newshour*. Retrieved from <http://www.pbs.org/newshour/rundown/los-angeles-methane-leak-is-officially-the-worst-in-u-s-history/>

<sup>1201</sup> Khan, A. (2016, February 25). Porter Ranch leak declared largest methane leak in U.S. history. *Los Angeles Times*. Retrieved from <http://www.latimes.com/science/sciencenow/la-sci-sn-porter-ranch-methane-20160225-story.html>

that first week at least.” Jackson noted that even after monitoring was initiated, it was intermittent rather than continuous.<sup>1202</sup>

- February 18, 2016 – Independent regional experts from USC and UCLA interviewed by Southern California Public Radio expressed skepticism that an industry-funded study ordered by the South Coast Air Quality Management District following the Aliso Canyon methane leak would be rigorously designed to answer specific questions about sub-chronic, cumulative exposures, including hydrogen sulfide, which was measured in the nearby Porter Ranch community at levels far greater than the average across American cities.<sup>1203</sup>
- February 13, 2016 – The Los Angeles County Department of Health prepared a *Supplemental Report* for its Expanded Air Monitoring Plan concerning the Southern California Gas Company’s Aliso Canyon storage facility long-term gas leak. The report addressed “chemicals of health concern” including toluene, ethylbenzene, xylene, hydrocarbons, VOCs, metals, and radon and concluded, “all results suggest that chemical exposures experienced by residents as a result of the gas leak are below the levels of concern that have been established by various regulatory agencies.”<sup>1204</sup> Remaining challenges named by the report itself included possible gaps in data collection, other chemicals present for which no sampling occurred, and further study of the symptoms reported by the public. Many independent scientists did not concur with the Department of Health’s ongoing statements that chemical exposures were below levels of concern. Issues raised included monitoring not initiated until a week after the leak began, lack of continuous monitoring, and reliance on “grab samples.” Speaking to *InsideClimate News*, John Bosch, a retired air-monitoring expert with more than 30 years’ experience at the EPA said, “Grab samples may be OK as a first-tier guestimate of what the problem is, but you really have to have continuous monitoring.”<sup>1205</sup>
- February 8, 2016 – PHMSA announced that it might issue its first federal safety regulations for gas storage sites such as Aliso Canyon, while also suggesting site operators voluntarily follow guidelines that the proposed rules (which would likely take years to issue) will likely mirror. According to a report in *InsideClimate News*, these guidelines would not require systems to stop the flow of gas in an emergency or mandate redundancies to prevent methane from leaking into the environment.” If PHMSA

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<sup>1202</sup> McKenna, P. (2016, February 18). What will be the health impact of 100+ days of exposure to California's methane leak? *InsideClimate News*. Retrieved from <http://insideclimatenews.org/news/17022016/health-impacts-aliso-canyon-porter-ranch-methane-leak-california-socal-gas>

<sup>1203</sup> O’Neill, S. (2016, February 18). Did the Porter Ranch gas leak cause long-term health damage? 89.33 *KPCC*. Retrieved from <http://www.scpr.org/news/2016/02/18/57666/did-the-porter-ranch-gas-leak-cause-long-term-health-impact/>

<sup>1204</sup> Los Angeles County Department of Health. (2016, February 13). *Aliso Canyon gas leak, Results of air monitoring and assessments of health, Supplemental report: Updated results and expanded chemical testing*. Retrieved from <http://www.publichealth.lacounty.gov/media/docs/SUPPLEMENTAL%20-%20Aliso%20Canyon%20Gas%20Leak-%20Results%20of%20Air%20Monitoring%20and%20Assessments%20of%20Health%20-%202016-02-13-16.pdf>

<sup>1205</sup> McKenna, P. (2016, February 18). What will be the health impact of 100+ days of exposure to California's methane leak? *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/17022016/health-impacts-aliso-canyon-porter-ranch-methane-leak-california-socal-gas>

proceeds to adopt industry guidelines, the resulting rules “may not address two key issues that turned Aliso Canyon into a disaster: emergency shutoff valves and a safer configuration of pipes.” Further, even with new regulations, storage units would most likely remain under state jurisdiction, “though state authorities may adopt any new federal rules.”<sup>1206</sup> A subsequent story reported on members of Congress pressing PHMSA to create the first federal standards for the 418 underground gas storage facilities for which it has authority to set regulations. In the hearing before a subcommittee of the House Committee on Transportation and Infrastructure, California representatives “spoke about their efforts to speed up PHMSA’s rulemaking for underground gas storage.”<sup>1207</sup>

- February 5, 2016 – As part of the Expanded Air Monitoring Plan, Los Angeles County Department of Health provided results for the primary chemicals of concern to assess health effects in residents, pets, and other animals in the community during the Southern California Gas Aliso Canyon storage facility leak. Those chemicals included methane, odorants, and benzene. The maximum level of methane detected was 4,340 ppm and the maximum level of benzene was 30.6 ppb. Early on, average weekly benzene levels that were close to the 1 ppb chronic exposure limit/ health protective level. “Methane levels have remained above normal, but have decreased substantially over time,” the report summarized. It also stated that odorants “... remained below instrument detection limits throughout the entire period, including immediately after the leak, even at locations near the leaking well,” and that “[b]enzene and other chemicals were originally detectable at levels above normal from within community sampling sites, but peak levels remained below acute exposure thresholds.”<sup>1208</sup> While the Los Angeles County Department of Health concluded that “health effects resulting from the on-going leak should be limited to short-term effects resulting from exposure to the odorants,” independent scientists, noting data gaps, have challenged these conclusions.
- January 25, 2016 – Some health experts and residents of Porter Ranch, California, adjacent to the Aliso Canyon gas field leak, expressed concern about long-term exposure to the odorous component of the gas, mercaptans, to which regulators attributed several symptoms of residents. Mercaptans are sulfurous chemicals that are added to natural gas to aid in the detection of leaks. Though California regulators have said the health problems, such as headaches, vomiting, and nosebleeds are temporary and will not lead to long-term damage, medical researchers described data gaps to *InsideClimate News*. There is “virtually no research on prolonged exposure to mercaptans.” Further, some researchers suggest the health problems may have been caused by different chemicals in

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<sup>1206</sup> McKenna, P. (2016, February 8). New federal gas storage regulations likely to mimic industry's guidelines. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/08022016/federal-gas-storage-regulations-likely-mimic-industry-guidelines-aliso-canyon-phmsa-api>

<sup>1207</sup> Song, L. (2016, February 26). *InsideClimate News*. U.S. pipeline agency pressed to regulate underground gas storage. Retrieved from <https://insideclimatenews.org/news/26022016/phmsa-pipeline-regulator-pressed-regulate-underground-natural-gas-storage-aliso-canyon-methane>

<sup>1208</sup> Los Angeles County Department of Health. (2016, February 5). Aliso Canyon gas leak: Results of air monitoring and assessments of health. Retrieved from <http://www.publichealth.lacounty.gov/media/docs/AlisoAir.pdf>

the gas, and that “regulators have downplayed the significance of other contaminants that are also present in the leak.”<sup>1209</sup>

- January 19, 2016 – Peter Richman, MD, president of the Los Angeles County Medical Association told the *Los Angeles Daily News* that, at nearly three months after the Aliso Canyon methane leak began, physicians had yet to receive a formal statement from the Los Angeles County Department of Public Health about airborne chemical pollutants related to the gas leak or guidelines on how to answer questions from patients about long-term health effects. Richman expressed special concern about prolonged exposure to methane and trace chemicals known to be carcinogenic. Another area physician reported that, as of the interview date, his urgent care practice had seen a hundred patients whose symptoms were consistent with exposure to leak-related pollutants.<sup>1210</sup>
- January 14, 2016 – Boston University researcher Nathan Phillips and Bob Ackley of Gas Safety USA drove a high precision GIS-enabled gas analyzer through roads throughout California’s San Fernando Valley adjacent to the Aliso Canyon gas leak in early January 2016. Early results showed methane levels elevated 2-67 times the background level.<sup>1211</sup>
- January 13, 2016 – Investigations into the possible cause of the gas leak in Aliso Canyon included the consideration that nearby fracking may have contributed to casing failure. In an email to the *Los Angeles Daily News*, California Department of Conservation Chief Deputy Jason Marshall said that their investigation will examine well records, including those pertaining to “well stimulation operations.”<sup>1212</sup> According to a 2015 report prepared for the California Council on Science and Technology, hydraulic fracturing is used about twice yearly to enhance storage “mostly in one facility serving southern California (Aliso Canyon).”<sup>1213</sup>
- January 13, 2016 – “Aliso Canyon is a wake-up call,” according to a *Rocky Mountain PBS News* investigative report on the state of U.S. natural gas infrastructure. Natural gas is no longer a cleaner fuel than coal when methane leakage rates exceeds 2-4 percent, but the vast size of the nation’s interconnected natural gas storage and pipeline systems

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<sup>1209</sup> Song, L. (2016, January 25). Mercaptans in methane leak make Porter Ranch residents sick, and fearful. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/22012016/porter-ranch-residents-health-effects-methane-leak-aliso-canyon-california>

<sup>1210</sup> Abram, S. (2016, January 19.). Doctors treating Porter Ranch residents want more gas-leak guidance. *Los Angeles Daily News*. Retrieved from <http://www.dailynews.com/health/20160119/doctors-treating-porter-ranch-residents-want-more-gas-leak-guidance>

<sup>1211</sup> Bartholomew, D. (2016, January 14). ‘Plume chaser’ researchers fan out across San Fernando Valley to map reach of Porter Ranch gas leak. *Los Angeles Daily News*. Retrieved from <http://www.dailynews.com/environment-and-nature/20160114/plume-chaser-researchers-fan-out-across-san-fernando-valley-to-map-reach-of-porter-ranch-gas-leak>

<sup>1212</sup> Wilcox, G. J. (2016, January 13). Regulators probing whether fracking was connected to Aliso Canyon gas well leak. *Los Angeles Daily News*. Retrieved from <http://www.dailynews.com/environment-and-nature/20160113/regulators-probing-whether-fracking-was-connected-to-aliso-canyon-gas-well-leak>

<sup>1213</sup> Long, J. C. S., Feinstein, L. C., Birkholzer, J., Jordan, P., Houseworth, J., Dobson, P. F., . . . Gautier, D. L. (2015). *An independent scientific assessment of well stimulation in California, Volume I: Well stimulation technologies and their past, present, and potential future use in California*. California Council on Science and Technology, Sacramento, CA. Retrieved from <https://ccst.us/publications/2015/2015SB4-v1.pdf>

makes difficult the task of tallying all the micro-leaks spread across the entire network and answering fundamental questions about exactly how much methane is being lost. The PBS report also expressed concern about the age of many of the system's component parts. According to the piece, nearly half (46 percent) of the nation's transmission pipelines, designed to carry high-pressure gas over long distances, were built in the 50s and 60s and are now more than a half century old.<sup>1214</sup>

- December 30, 2015 – According to the *Los Angeles Daily News*, which unearthed November 2014 state regulatory filing documents, the Southern California Gas Company knew about the corrosion and potential for leakage at Aliso Canyon prior to the massive blow-out. “In written testimony to the California Public Utilities Commission, [SoCalGas Director of Storage Operations Phillip] Baker described a reactive maintenance process that hinted at major leakage problems underground.”<sup>1215</sup>
- November 20, 2015 – California state agencies collaborated with Aviation Scientific to measure methane emission rates at two early November dates, finding rates of 44,000±5,000 kilograms of methane per hour and 50,000±16,000 kilograms of methane per hour. The results indicated that the Aliso Canyon gas leak would have contributed about a quarter of California's methane emissions for the time period studied.<sup>1216</sup>
- November 20, 2015 – According to the *Los Angeles Times*, one month into the Aliso Canyon ongoing gas leak, Southern California Gas warned that it “might need several months” to plug the leak. An order from California's Division of Oil, Gas and Geothermal Resources, “stated that an ‘uncontrolled flow of fluids’ and gas was escaping and the operator had failed to fully inform state officials about the well's status. Steve Bohlen, the state oil and gas supervisor, also directed the company to submit a schedule for remediation work or for drilling a relief well.”<sup>1217</sup>
- October 19, 2015 – *Houston Public Media* reported on the 125 caverns carved out of salt storing natural gas liquids (NGLs), thousands of feet under the city of Mont Belvieu, Texas, east of Houston. “There have been fiery accidents here. But nothing like what happened 23 years ago at a different [NGL] storage site 100 miles to the west. ‘A bomb-like blast literally blew residents in this small community out of their beds this morning, said a reporter for Dallas's Channel 8 as he did a live report just outside the city of Brenham.’ That blast, which killed three and injured 21, was reportedly caused by the

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<sup>1214</sup> Wirfs-Brock, J. (2016, January 13). Vast California methane leak is dire but not unique in aging infrastructure. *Rocky Mountain PBS News*. Retrieved from <http://inewsnetwork.org/2016/01/13/vast-california-methane-leak-is-dire-but-not-unique-in-aging-infrastructure/>

<sup>1215</sup> Reicher, M. (2015, December 30). SoCalGas knew of corrosion at Porter Ranch gas facility, doc shows. *Los Angeles Daily News*. Retrieved from <http://www.dailynews.com/general-news/20151230/socalgas-knew-of-corrosion-at-porter-ranch-gas-facility-doc-shows>

<sup>1216</sup> California Air Resources Board. (2015, November 20). Report on greenhouse gas emissions from Aliso Canyon leak. *Los Angeles Times*. Retrieved from <http://documents.latimes.com/report-greenhouse-gas-emissions-aliso-canyon-leak/>

<sup>1217</sup> Barboza, T. (2015, November 20). Natural gas leak that's sickening Valley residents could take months to fix. *Los Angeles Times*. Retrieved from <http://www.latimes.com/local/california/la-me-1121-gas-leak-20151121-story.html>



lack of an emergency shut-off valve. There are no federal standards in place for such requirements. Twenty-three years later, a month prior to the *Houston Public Media* report, “at a hearing held by the U.S. Senate Committee on Commerce, Science, & Transportation, Donald Santa, head of the Interstate Natural Gas Association of America, told the senators that it was only in recent weeks that the industry approved standards for storing natural gas.” Texas did enact legislation a year after the deadly blast “and now requires emergency shutoff valves and inspections for leaks every five years.”<sup>1218</sup>

- October 5, 2011 – The federal district court in Topeka struck down Kansas gas-safety laws in 2010, and 11 underground storage sites with a capacity of more than 270 billion cubic feet of gas have gone uninspected, leaving thousands of Kansans to live on and around uninspected gas-storage fields.<sup>1219</sup>
- 2008 – When considering the possibility of storing natural gas in a variety of underground gas storage facilities, the UK government commissioned the British Geological Survey to identify the main types of facilities currently in operation worldwide along with any documented or reported failures and incidents which have led to release of stored product. The researchers found that California had the most incidents, but concluded that many of these problems and geological factors would not necessarily be applicable to the UK. The incidents most relevant to gas storage in the UK resulted from a failure of either the man-made infrastructure (well casings, cement, pipes, valves, flanges, compressors etc.), or human error, which has included overfilling of caverns and inadvertent intrusion. Extreme natural events, including earthquakes, also played a role. The researchers looked closely at incidents in salt caverns that had been repurposed to store gas. They reported that “early salt cavern storage in the US was done in brine wells that had been solution mined [in which salt deposits are melted away with hot water or steam] without consideration for subsequent storage in the depleted caverns. This practice sometimes resulted in later problems for storage operations in retrofitted brine caverns.” The authors conclude that the rate for a geological failure of the storage cavity in an underground gas storage facility is of the order of  $10^{-5}$  failures per well year.<sup>1220</sup>

### **Liquefied natural gas (LNG) facilities**

***LNG is methane vapor that has been turned into liquid through a cryogenic process that lowers the temperature of the gas to its condensation point (– 259° F). Chilling natural gas to its liquid state shrinks its volume by a factor of 600, allowing LNG to be transported to places***

<sup>1218</sup> Fehling, D. (2015, October 19). On edge of Houston, underground caverns store huge quantities of natural gas liquids. *Houston Public Media*. Retrieved from <http://www.houstonpublicmedia.org/articles/news/2015/10/19/124674/on-edge-of-houston-underground-caverns-store-huge-quantities-of-natural-gas-liquids/>

<sup>1219</sup> Lefler, D. (2011, October 5). Lawsuit leaves large gas storage fields in Kansas unregulated. *Wichita Eagle*. Retrieved from <http://www.kansas.com/news/article1071558.html>

<sup>1220</sup> Keeley, D. (Health and Safety Laboratory). (2008). *Failure rates for underground gas storage: Significance for land use planning assessments*. Health and Safety Laboratory for the Health and Safety Executive, Derbyshire, UK. Retrieved from <http://www.hse.gov.uk/research/rrpdf/rr671.pdf>

*where pipelines don't reach, as when it is exported overseas on massive tanker ships. LNG is also sometimes used as vehicle fuel in, for example, long-haul trucks. LNG facilities encourage fracking by creating storage for the glut of gas that fracking has created, by enabling its export, and by driving up prices and profit margins. LNG facilities are capital-intensive and consist of liquefaction plants, import/export terminals, tanker ships, regasification terminals, and inland storage equipment.*

*LNG liquefaction requires immense energy in order to achieve the ultra-low temperatures required for condensation. An LNG facility typically requires its own power plant. Because they rely on evaporative cooling, LNG tanks are leaky by design: to maintain the liquid at super-chilled temperatures and prevent explosions, vaporized gas is vented from storage tanks directly into the atmosphere. Larger tanks are engineered to capture boiled-off gas, but this process is not leak-proof. Before it is combusted or sent down a pipeline, LNG must be regasified via an energy-intensive process that requires massive infrastructure of its own, including periodic flaring to control pressure. Refrigeration, venting, leaks, flaring, and shipping make LNG more energy intensive than conventional natural gas. A recent analysis shows that exporting large quantities of LNG from the United States will likely cause global greenhouse gas emissions to rise not only because of its energy penalty but also because LNG exports add more fossil fuels to the global market and extend the lifespan of U.S. coal-fired plants.*

*LNG creates acute public safety risks. LNG explodes when spilled into water and, if spilled on the ground, can turn into rapidly expanding, odorless clouds that can flash-freeze human flesh and asphyxiate by displacing oxygen. If ignited at the source, LNG vapors can become flaming "pool fires" that burn hotter than other fuels and cannot be extinguished. LNG fires burn hot enough to cause second-degree burns on exposed skin up to a mile away. LNG facilities pose significant risks to nearby population centers and have been identified as potential terrorist targets.*

- July 13, 2018 – A retrospective look at the risk management and risk governance used to develop and construct three LNG facilities in Gladstone, Australia evaluated the process by which multiple stakeholders—including government, business, community, and environmental groups—contributed to decision-making and management. The framework developed by the International Risk Governance Council was used for comparison. Environmental, social, and economic impacts occurred during construction, including death of harbor marine life, increased housing prices, and increased cost of living. Several problems in risk assessment and management were identified, including lack of cooperation between organizations at the onset of construction; disagreement as to whether monitoring and compliance mechanisms were adequate; and concern that the government was reactive to problems, rather than attempting to prevent or mitigate risks. Several recommendations were made to improve the risk management process of future projects.<sup>1221</sup>

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<sup>1221</sup> van der Vegt, R. G. (2018). Risk assessment and risk governance of liquefied natural gas development in Gladstone, Australia. *The Extractive Industries and Society*, 6(1), 58-66. doi: 10.1111/risa.12977

- February 12, 2018 – Two LNG storage tanks were shut down at Cheniere Energy’s Sabine Pass export facility after leaking LNG was found in a containment ditch around one of the tanks and 14 separate natural gas leaks were discovered around the base of a second tank. The Sabine Pass facility is located on the U.S. Gulf Coast on the border between Texas and Louisiana. Emergency procedures were put into place to assure the safety of the 107 on-site workers, but the public was not notified about this incident until more than two weeks later. Inspection revealed four cracks up to six feet long in the outer shell of the tank that had leaked LNG. These tanks are double walled, but only the inner tank is designed to tolerate the super-chilled temperature of LNG. The outer tank, rated to only -25° F, became brittle upon contact with -260° F LNG. The resulting investigation uncovered a long history of safety issues at this plant, including 11 other incidents involving these tanks that had occurred as far back as 2008 (when Sabine Pass was operating as an LNG import facility) after the federal Pipeline and Hazardous Materials Safety Administration (PHMSA) ordered Cheniere to conduct a root cause analysis and turn over records of any prior leaks.<sup>1222</sup> The agency also issued an order stating, “continued operation of the affected tanks without corrective measures is or would be hazardous to life, property, and the environment.” Sabine Pass facility was required to receive written authorization from the Federal Energy Regulatory Commission (FERC) before the tanks could be put back in service.<sup>1223</sup> As part of a later hearing, parts of which were closed to the press and to the public, an accident investigator with PHMSA said that she had struggled with the company to get information “timely and in enough detail.”<sup>1224</sup> In April 2018, the parties agreed to resolve the issue without administrative proceedings or litigation.<sup>1225</sup>
- November 20, 2017 – Using a hybrid lifecycle and energy strategy analysis, a team of energy researchers investigated the potential climate impacts of U.S. LNG exports to Asia. They found that gas emissions were widely variable, dependent on the specific destination and the ultimate purpose for which the gas is used. Despite this range, under a scenario in which U.S. LNG exports continue to rise, “emissions are not likely to decrease and may increase significantly” because of additional energy demand, higher U.S. emissions, and increased methane leakage. The study also predicted that increased LNG exports could actually prolong the lifespans of coal-fired plants within the United States. All together, these factors, “have the very real potential to undermine any prospective climate benefit in the long run.” Going forward, policymakers must consider “the complete climate ramifications of LNG exports.”<sup>1226</sup> *E&E News*, reporting on the study, quoted one of the authors as saying, “The implications of our paper are that the

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<sup>1222</sup> Mandel, J., & Soraghan, M. (2018, February 12). Feds order partial shutdown at Cheniere LNG export site. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060073537>

<sup>1223</sup> Schleifstein, M. (2018, February 10). Sabine Pass LNG ordered to shut down leaking gas storage tanks. *Nola.com*. Retrieved from

[http://www.nola.com/environment/index.ssf/2018/02/sabine\\_pass\\_lng\\_ordered\\_to\\_shu.html](http://www.nola.com/environment/index.ssf/2018/02/sabine_pass_lng_ordered_to_shu.html)

<sup>1224</sup> Klump, E., & Soraghan M. (2018, March 22). Cheniere says no public danger from Sabine Pass leaks. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060077135>

<sup>1225</sup> Cheniere settles Sabine Pass LNG tanks issue with PHMSA. *LNG World News*. Retrieved from <https://www.lngworldnews.com/cheniere-settles-sabine-pass-lng-tanks-issue-with-phmsa/>

<sup>1226</sup> Gilbert, A. Q., & Sovacool, B. K. (2017). US liquefied natural gas (LNG) exports: Boom or bust for the global climate? *Energy*, 141, 1671-1680. doi: 0.1016/j.energy.2017.11.098

greenhouse gas impacts from exporting U.S. natural gas...here at home and abroad, can be very, very bad.”<sup>1227</sup>

- November 16, 2017 – A legal analysis in the *Energy Law Journal* examined the contested decision by the Federal Energy Regulatory Commission to authorize the expansion of the Dominion Cove Point LNG facility to allow for export as well as import activity, by examining the multiple direct and indirect effects of the expansion. Direct effects included impacts on water quality, the North Atlantic right whale, and the public safety of local residents. Indirect effects included an increase in domestic fracking, increase in tanker traffic, and exacerbation of climate change as export markets increase demand for natural gas. Because this latter set of problems is not directly related to facility expansion but rather to increased LNG exports, two different federal agencies have jurisdiction. The responsibilities of FERC and the Department of Energy (DOE) were clarified regarding this distinction. FERC handles the environmental review, while the DOE regulates export of LNG. In the case of Cove Point, FERC had issued a finding of no significant impact and was therefore not legally required to investigate indirect effects such as climate change. The analysis therefore concluded that FERC followed proper procedures and that the DOE would be a more appropriate target of legal action because of its control over LNG exports. This analysis reveals the diffusion of responsibility among federal agencies regulating LNG facilities and the legal difficulties of addressing far-removed, indirect harms.<sup>1228</sup>
- July 25, 2017 – Citing volatile market conditions, Malaysia’s energy giant Petronas cancelled plans for a massive LNG export terminal at the mouth of the Skeena River on British Columbia’s remote northwest coast in Canada. As reported extensively by *The Tyee*, the project was the target of intense protest by First Nations people and the subject of many lawsuits, as it threatened public health and would industrialize pristine salmon habitat. “At one time as many as twenty LNG projects were proposed for coastal communities, but not one has been built. The majority of largely Asian-backed proponents have now cancelled or deferred their projects. A 50 percent drop in global oil prices combined with a 70 percent drop in global LNG prices forced Petronas to...scuttle a number of projects over the last two years.”<sup>1229</sup>
- July 10, 2017 – Using a lifecycle assessment and optimization analysis to forecast the environmental impacts of LNG, researchers modeled three usage scenarios: hydrogen production; electricity generation; and vehicle fuel. The model assumed LNG transport by pipeline only, and not by tanker. The highest environmental impact in each case was

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<sup>1227</sup> Gilmer, E. M., & Mandel, J. (2017, December 15). Increased LNG exports would spell trouble for climate – study. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060069129>

<sup>1228</sup> Rhodes, K. (2017). The weakest link: The consistent refusal to consider far-removed indirect effects of the expansion of LNG terminals. *Energy Law Journal*, 38 (2), 431-453.

<sup>1229</sup> Nikiforuk, A. (2017, July 25). ‘Basic economics’ kill \$11-billion LNG project on BC’s coast. *The Tyee*. Retrieved from [https://thetyee.ca/News/2017/07/25/LNG-Project-BC-Coast-Killed/?utm\\_source=facebook&utm\\_medium=social&utm\\_content=072517-4&utm\\_campaign=editorial-0717](https://thetyee.ca/News/2017/07/25/LNG-Project-BC-Coast-Killed/?utm_source=facebook&utm_medium=social&utm_content=072517-4&utm_campaign=editorial-0717)

global warming potential (GWP), and the highest GWP occurred when LNG was used as vehicle fuel.<sup>1230</sup>

- April 11, 2017 – The World Bank Group, which makes loans to developing nations for capital projects like infrastructure, released environmental, health, and safety guidelines for LNG facilities. These guidelines address the risks of spills, fire, explosions, air quality impacts, venting, flaring, and fugitive emissions. Also addressed was the danger of “roll-over,” a phenomenon that occurs when layers of LNG of different density in a storage tank mix inappropriately. The result can be a rapid release of vapors and rise in pressure, potentially leading to catastrophic structural damage of the tank.<sup>1231</sup>
- March 30, 2017 – Transportation researchers identified and assessed potential risks to public safety from LNG transport on inland waterways and as a fuel for vessels and ferries. The hazards included the possibility of collision with other ships or with stationary objects such as bridges, as well as the threats of vapor release, flash and jet fires, boiling liquid expanding vapor explosion, and rapid phase transition. Firefighting strategies for different scenarios were proposed.<sup>1232</sup>
- March 9, 2017 – Liquefaction, LNG transport, and LNG evaporation determined more than 50 percent of LNG’s global warming potential (GWP) in a “cradle to gate” life cycle analysis of LNG imported to the UK from Qatar. The analysis confirmed the dangerous effect of fugitive methane emissions on the total GWP of the supply chain. Other important parameters affecting GWP included the shipping distance and the tank volume.<sup>1233</sup>
- December 22, 2016 – Methane emissions from the heavy-duty transportation sector have climate change implications, according to a “pump-to-wheels” evaluation of natural gas powered vehicles and the compressed natural gas and LNG stations that fuel them. While fueling stations themselves leak methane, tailpipe and crankcase emissions were the highest sources.<sup>1234</sup>
- May 2, 2016 –The potential economic and greenhouse gas (GHG) impacts of importing LNG to Hawaii for electricity generation was modeled. Methane is a potent GHG, and although the use of LNG would decrease the local GHG output of Hawaii’s electrical

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<sup>1230</sup> Zhang, Y., Jiang, H., Li, J., Shao, S., Hou, H., Qi, Y., & Zhang, S. (2017). Life cycle assessment and optimization analysis of different LNG usage scenarios. *International Journal of Life Cycle Assessment*. Advance online publication. doi: 10.1007/s11367-017-1347-2

<sup>1231</sup> World Bank Group. (2017). Environmental, health, and safety guidelines for liquefied natural gas facilities. Retrieved from [https://www.ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/sustainability-at-ifc/publications/publications\\_policy\\_ehs-lng](https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_ehs-lng)

<sup>1232</sup> Galieriková, A., Kalina, T., & Sosedová, J. (2017). Threats and risks during transportation of LNG on European inland waterways. *Transport Problems*, 12(1), 73-81. doi: 10.20858/tp.2017.12.1.7

<sup>1233</sup> Tagliaferri, C., Clift, R., Lettieri, P., & Chapman, C. (2017). Liquefied natural gas for the UK: A life cycle assessment. *International Journal of Life Cycle Assessment*, 22, 1944–1956. doi: 10.1007/s11367-017-1285-z

<sup>1234</sup> Clark, N. N., McKain, D. L., Johnson, D. R., Wayne, W. S., Li, H., Akkerman, V., ... Ugarte, O. J. (2017). Pump-to-wheels methane emissions from the heavy-duty transportation sector. *Environmental Science & Technology*, 51(2), 968-976. doi: 10.1021/acs.est.5b06059

sector, lifecycle (global) GHG emissions would likely increase. This study did not examine other potential environmental impacts of LNG. Currently, the majority of Hawaii's electricity is provided by oil-fired generation.<sup>1235</sup>

- November 12, 2015 – New York Governor Andrew Cuomo rejected a heavily contested proposal to construct an LNG terminal 19 miles off the coast of Long Island. From his letter to the Maritime Administration: “The security and economic risks far outweigh any potential benefits....The potential for disaster with this project during extreme weather or amid other security risks is simply unacceptable.” The governor also noted the risks posed to scallop and squid fisheries as well as the project's conflict with a proposed large-scale, offshore wind farm.<sup>1236</sup>
- September 30, 2015 – Measurements of the gaseous and particulate emissions of a cruise ferry on the Baltic Sea using a dual-fuel engine showed that LNG is not a clean fuel for ships. Methane made up about 85 percent of the vessel's hydrocarbon emissions. Particulate emissions showed a huge amount of volatile and nonvolatile particles, both of which are hazardous to human health.<sup>1237</sup>
- September 26, 2014 – The U.S. Government Accountability Office (GAO) issued a report of the federal process for reviewing applications to export LNG. As part of the process, the DOE and FERC consider public comment. Numerous environmental concerns include the risk that exports will increase hydro-fracking for natural gas, along with its associated environmental effects and greenhouse gas emissions. Under the National Environmental Policy Act, the DOE must consider the environmental effects of its decisions.<sup>1238</sup>
- April 23, 2014 –The dynamics and hazards from a LNG spill are not well understood and require further research, according to a comprehensive review of research into the LNG production chain from Australia that examined vapor production, vapor dispersion, and mechanisms of combustion. Noting the “intrinsic process safety issues” of LNG as well as potential attraction as a terrorist target, authors described various threats to human safety, including pool fires, jet fires, and vapor cloud explosions.<sup>1239</sup>
- December 14, 2009 – Certain LNG hazards are not “understood well enough to support a terminal siting approval,” according to a Congressional Research Service (CRS) report that summarizes LNG hazards in the context of federal rules related to where LNG

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<sup>1235</sup> Coffman, M., Bernstein, P., Wee, S., & Schafer, C. (2017). Economic and GHG impacts of natural gas for Hawaii. *Environmental Economics and Policy Studies*, 19, 519–536. doi: 10.1007/s10018-016-0157-2

<sup>1236</sup> Santora, M. (2015, November 12). Cuomo rejects natural gas port proposed off Long Island. *The New York Times*. Retrieved from [https://www.nytimes.com/2015/11/13/nyregion/cuomo-rejects-natural-gas-port-proposed-off-long-island.html?\\_r=0](https://www.nytimes.com/2015/11/13/nyregion/cuomo-rejects-natural-gas-port-proposed-off-long-island.html?_r=0)

<sup>1237</sup> Anderson, M., Salo, K., & Fridell, E. (2015). Particle- and gaseous emissions from an LNG powered ship. *Environmental Science & Technology*, 49, 12568–12575. doi: 10.1021/acs.est.5b02678

<sup>1238</sup> U.S. Government Accountability Office. (2014, September). *Federal approval process for liquefied natural gas exports*. GAO-14-762. Retrieved from <https://www.gao.gov/assets/670/666177.pdf>

<sup>1239</sup> Ikealumba, W. C., & Wu, H. Some recent advances in liquefied natural gas (LNG) production, spill, dispersion, and safety. *Energy & Fuels*, 28(6), 3556–3586. doi: 10.1021/ef500626u

terminals are located. Potential risks include pool fires and flammable vapor clouds, as well as the possibility of terrorist attacks. The analysis points out the need for additional LNG safety research.<sup>1240</sup>

- July 7, 2009 – Because LNG projects are among the most expensive energy projects, the reserves of gas to justify the investment need to be large enough to guarantee about 30 years of production, according to a report by the Joint Research Centre of the European Union.<sup>1241</sup>
- May 13, 2008 – LNG infrastructure is “inherently hazardous and it is potentially attractive to terrorists,” according to a CRS study that was prepared at a time when the United States was a net importer of LNG. Security of tankers, import terminals, and inland storage plants were identified as issues of concern. Serious risks include pool fires with intense heat, which can occur when LNG spills near an ignition source; flammable vapor clouds that can drift until reaching an ignition source; and a rapid phase transition that can generate a flameless explosion. As per this report, there have been 13 serious accidents at onshore LNG terminals since 1944.<sup>1242</sup>
- February 22, 2007 – The GAO examined the results of studies on the consequences of an LNG spill and discussed expert opinion about the consequences of a terrorist attack on an LNG tanker. The studies indicate that 30 seconds of exposure to the heat of an LNG fire could cause burns up to a distance of about one mile. The experts concluded that this would be the most likely public safety hazard, with the risk of explosion less likely. Recommendations were made for further studies, including evaluating the possibility of “cascading failure,” where multiple LNG tanks on a ship might fail in sequence.<sup>1243</sup>
- September 9, 2003 – As part of a larger investigation of potential terrorist targets in wake of the 9/11 attacks, the CRS provided a background report to the U.S. Congress on the security of LNG terminals in the United States. At the time, the United States was a net importer of natural gas, and LNG was shipped from overseas to U.S. ports. CRS identified LNG tanker ships and storage infrastructure as “vulnerable to terrorism,” noting that tankers could be turned as weapons against coastal cities and that inland LNG facilities are typically located near large population centers. The CRS further noted that

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<sup>1240</sup> [Name redacted]. (2009, December). *Liquefied natural gas (LNG) import terminals: Siting, safety, and regulation*. Congressional Research Service. RL32205. Retrieved from [https://www.everycrsreport.com/files/20091214\\_RL32205\\_e95cb50c88dbd56a2c8f706b2d521ef7ae81ee00.pdf](https://www.everycrsreport.com/files/20091214_RL32205_e95cb50c88dbd56a2c8f706b2d521ef7ae81ee00.pdf)

<sup>1241</sup> Kavalov, B., Petric, H., & Georgakaki, A. (2009). *Liquefied natural gas for Europe—some important issues for consideration*. European Commission Joint Research Centre, Reference Report. doi: 10.2790/1045.

<sup>1242</sup> Parfomak, P. W. (2008, May). *Liquefied natural gas (LNG) infrastructure security: Issues for Congress*. Congressional Research Service. RL32073. Retrieved from <https://www.hsdl.org/?view&did=486464>

<sup>1243</sup> U.S. Government Accountability Office. (2007, February). *Public safety consequences of a terrorist attack on a tanker carrying liquefied natural gas need clarification*. GAO-07-316. Retrieved from <https://www.gao.gov/new.items/d07316.pdf>

the public cost of security for LNG shipments, via Coast Guard escorts of tankers through coastal shipping channels, was considerable (\$40,000-\$80,000 per tanker).<sup>1244</sup>

- August 1, 1995 – The U.S. Department of Transportation identified three important hazardous properties of LNG: flammability hazards (fire or explosion from ignition of leaks); toxicity hazards (asphyxiation from exposure to non-odorized fuel gas); cryogenic hazards (personal injury plus structural failure of equipment from prolonged exposure to extremely cold temperatures.)<sup>1245</sup>

### **Gas-fired power plants**

*Found in every state except Vermont, natural gas-fired power plants surpassed coal-burning plants as the leading source of electrical generation in the United States in 2016. There are two types of gas-fueled power plants: combined cycle plants and simple cycle plants. Both types are major emitters of carbon dioxide, uncombusted methane, and nitrogen oxides, which contribute to the formation of ground-level ozone (smog). Combined cycle gas plants reuse waste heat to generate additional electricity and are roughly equivalent in efficiency to an older coal plant. Simple cycle gas plants—also called peaker plants—can be turned on and off faster to meet fluctuating energy demands when electricity needs peak, but they are much less efficient and more polluting than combined cycle plants. Simple cycle peaker plants can often generate more nitrogen oxides and more carbon monoxide than coal plants.*

*Gas-fired combined cycle plants were formerly promoted as a bridge to reduce emissions while renewables ramp up. However, within the last four years, renewable prices have fallen low enough to allow a transition directly from coal to solar and wind power, revealing that gas plants, with long returns on investment, are more barrier than bridge to renewable energy. At the same time, the lifecycle emissions of both types of gas-fired power plants have been shown to be far higher than previously estimated. New natural gas plants lock in demand for gas for longer than current climate scenarios dictate, which call for net-zero carbon emissions by mid-century. Gas plants thus risk becoming stranded assets, meaning that they would need to be decommissioned well before the end of their lifespan.*

*Gas-fired simple cycle plants used on demand as peakers are becoming obsolete as battery technology now allows for the storage of renewable energy, decreasing the need for gas plants to provide power in times of peak demand.*

*Emerging evidence shows a variety of health impacts to people living near gas-fired power plants.*

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<sup>1244</sup> Congressional Research Service. (2003, September 9). *Liquefied natural gas (LNG) infrastructure security: Background and issues for Congress*. Retrieved from [http://www.energy.ca.gov/lng/documents/CRS\\_RPT\\_LNG\\_INFRA\\_SECURITY.PDF](http://www.energy.ca.gov/lng/documents/CRS_RPT_LNG_INFRA_SECURITY.PDF)

<sup>1245</sup> U.S. Dept. of Transportation, Federal Transit Administration. (1995, August 1). *Summary of assessment of the safety, health, environmental and system risks of alternative fuel*. Retrieved from <https://rosap.ntl.bts.gov/view/dot/8403>



- February 11, 2019 – The mayor of Los Angeles announced that the city will close rather than modernize three gas-fired power plants after the California legislature passed a bill requiring the state to get 100 percent of its electrical power from climate-friendly sources by 2045. Instead, the city will pursue clean energy technologies with battery storage. The Scattergood, Haynes, and Harbor natural gas plants will be phased out by 2029.<sup>1246</sup> In a press statement, Los Angeles mayor Eric Garcetti said, “This is the beginning of the end of natural gas in Los Angeles. The climate crisis demands that we move more quickly to end dependence on fossil fuel, and that’s what today is all about.”<sup>1247</sup>
- February 8, 2019 – The Arizona Corporation Commission voted to extend the state moratorium on buying or building new gas-fired power plants and called for energy storage to provide peak power rather than additional natural gas plants.<sup>1248</sup>
- April 1, 2018 – Integrating environmental, economic, and social factors to evaluate overall sustainability, a British team compared shale gas with other electricity options in the United Kingdom. Fracking emerged as one of the least sustainable ways to produce electricity. Specifically, shale gas ranked seventh out of nine options for electrical generation, with wind and solar energy scoring the best and coal the worst. These results suggest that “a future electricity mix ... would be more sustainable with a lower rather than a higher share of shale gas.”<sup>1249, 1250</sup>
- July 14, 2017 – A European team evaluated the performance of coal- and gas-fired power plants that are used to back up renewable energy as the European Union transitions to greater reliance renewable sources for electrical generation. As renewables increasingly dominate, traditional fossil fuel plants will be required to ramp up and down and cycle on and off more frequently. However, these ramping and cycling events will negatively impact the operation of the fossil fuel power plants, as they will become fatigued, resulting in higher operational and maintenance costs, reduced lifetime, degraded performance, and higher emissions of air pollution over time. Gas plants are generally more efficient, faster, and less polluting than coal, but under certain conditions will

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<sup>1246</sup> Associated Press. (2019, February 11). Mayor: LA will ditch plan to rebuild natural gas plants. *U.S. News & World Report*. Retrieved from <https://www.usnews.com/news/best-states/california/articles/2019-02-11/mayor-la-will-ditch-plan-to-invest-billions-in-fossil-fuels>

<sup>1247</sup> Groom, N. (2019, February 12). Los Angeles abandons new natural gas plants in favor of renewables. *Reuters*. Retrieved from <https://www.reuters.com/article/us-usa-california-natgas/los-angeles-abandons-new-natural-gas-plants-in-favor-of-renewables-idUSKCN1Q12C9>

<sup>1248</sup> Wichner, D. (2019, February 8). Regulators extend ban on new gas power plants in Arizona. *Arizona Daily Star*. Retrieved from [https://tucson.com/business/regulators-extend-ban-on-new-gas-power-plants-in-arizona/article\\_5d492ca0-5763-5fe5-8eac-29f63cbe2b72.html](https://tucson.com/business/regulators-extend-ban-on-new-gas-power-plants-in-arizona/article_5d492ca0-5763-5fe5-8eac-29f63cbe2b72.html)

<sup>1249</sup> Cooper, J., Stamford, L., & Azapagic, A. (2018). Sustainability of UK shale gas in comparison with other electricity options: Current situation and future scenarios. *Science of The Total Environment*, 619-620, 804-814. doi: 10.1016/j.scitotenv.2017.11.140

<sup>1250</sup> Gabatiss, Josh. (2018, January 16). Fracking is one of the least sustainable ways to produce electricity. *The Independent*. Retrieved from <https://www.independent.co.uk/environment/fracking-electricity-production-energy-shale-gas-extraction-sustainable-a8160661.html>

produce more nitrogen oxides (a component of smog) and more carbon monoxide than coal-fired plants. Current fossil fuel technology will need significant and costly improvements in order to handle the increased gradients, number of starts, lower minimum load and emissions.<sup>1251</sup>

- February 1, 2017 – There is a high degree of uncertainty about the methane emissions from natural gas-fired power plants. As part of a study that also included oil refineries, a Purdue University team evaluated methane emissions from three gas-fired power plants in Utah, Indiana, and Illinois during hours of peak operation. Both fugitive methane leaks from the facility at large as well as uncombusted methane from the stacks were measured using aircraft. Results showed that average methane emission rates were larger than facility-reported estimates by factors of 21-120. The authors concluded that gas-fired power plants “may be significant contributors to annual methane emissions in the U.S. despite lack of facility emission reporting in U.S. inventories. Furthermore, results suggest that the primary source of methane emissions at these facilities may be from noncombustion sources.”<sup>1252</sup>
- June 28, 2015 – Pregnant women living near gas-fired power plants were more likely to give birth prematurely, according to a study of more than 400,000 infants born in Florida between 2004 and 2005. This study investigated associations between adverse birth outcomes and residential proximity to several types of power plants, including those burning oil, gas, and solid waste.<sup>1253</sup>
- September 22, 2012 – An investigation of methane and nitrous oxide emissions at eight different gas-fired power plants in Korea found that emissions can vary depending on combustion technologies. Results from this study differed both from those used as default emission rates by the Intergovernmental Panel on Climate Change and from those measured in Japan. The authors concluded that technology-specific and country-specific emission factors for gas-fired power plants need to be established.<sup>1254</sup>
- February 27, 2012 – Using hospitalization data, a research team working in New York State examined whether living near a fuel-fired power plant increased the rate of hospitalization for asthma, acute respiratory infections, and chronic obstructive pulmonary disease, all of which have known links to air pollution exposure. Preliminary analyses of hospitalization rates associated with a residence in a zip code with a power plant stratified by type of fuel used (coal, gas, oil, or solid waste) did not show clear or

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<sup>1251</sup> Gonzalez-Salazar, M. A., Kirsten, T., & Prchlik, L. (2018). Review of the operational flexibility and emissions of gas- and coal-fired power plants in a future with growing renewables. *Renewable and Sustainable Energy Reviews*, 82, Part 1, 1497-1513. Advance online publication. doi: 10.1016/j.rser.2017.05.278

<sup>1252</sup> Lavoie, T. N., Shepson, P. B., Gore, C. A., Stirm, B. H., Kaeser, R., Wulle, B., . . . Rudek, J. (2017). Assessing the methane emissions from natural gas-fired power plants and oil refineries. *Environmental Science & Technology*, 51(6), 3373-3381. doi 10.1021/acs.est.6b05531

<sup>1253</sup> Ha, S., Hu, H., Roth, J., Kan, H., & Xu, X. (2015). Associations between residential proximity to power plants and adverse birth outcomes. *American Journal of Epidemiology*, 182(3), 215-224. doi: 10.1093/aje/kwv042

<sup>1254</sup> Lee, S., Kim, J., Lee, J., Lee, S., & Jeon, E.-C.. (2012). A study on the evaluations of emission factors and uncertainty ranges for methane and nitrous oxide from combined-cycle power plant in Korea. *Environmental Science and Pollution Research*, 20(1), 461-468. doi: 10.1007/s11356-012-1144-1

consistent patterns. Therefore, patients were classified as exposed if they lived in a zip code with at least one power plant in it regardless of the type of fuel used. After adjusting for age, sex, race, median household income, and rural/urban residence, the research team found significantly elevated rates of hospitalization for asthma (11 percent increase), acute respiratory infection (15 percent increase), and chronic obstructive pulmonary disease (17 percent increase) among New Yorkers living near at least one fuel-fired power plant.<sup>1255</sup>

- October 20, 2011 – Emergency room visits and hospital admissions in elderly people living close to a new gas-fired power plant in Italy were counted and related to levels of air pollution both before and after the plants became operational. The results showed that ambient levels of nitrogen oxides and particulate matter rose after the plant started operations. Further, despite the fact that pollutants were below the limits set by the European legislation, there was a positive correlation between number of emergency room visits and daily concentrations of these air pollutants among nearby residents aged 70 or older.<sup>1256</sup>
- April 5, 2010 – Most new fossil fuel power plants are gas-powered. In this study, a research team estimated the number of premature deaths from fine particulate matter that would result from bringing 29 proposed fossil-fuel power plants in Virginia on line. Their modelling predicted that, were all 29 plants made operational, concentrations of fine particulate air pollution would rise in 271 counties across 19 states. Over a six-year period, 104 cumulative excess deaths would occur due to operations of these proposed plants.<sup>1257</sup>

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<sup>1255</sup> Liu, X., Lessner, L., & Carpenter, D. O. (2012). Association between residential proximity to fuel-fired power plants and hospitalization rate for respiratory diseases. *Environmental Health Perspectives*, 120(6), 807–810. doi: 10.1289/ehp.1104146

<sup>1256</sup> Di Ciaula, A. (2012). Emergency visits and hospital admissions in aged people living close to a gas-fired power plant. *European Journal of Internal Medicine*, 23(2), e53-e58. Advance online publication. doi: 10.1016/j.ejim.2011.09.013

<sup>1257</sup> Hermann, R. P., Divita Jr, F., & Lanier, J. O. (2010). Predicting premature mortality from new power plant development in Virginia. *Archives of Environmental Health*, 59(10). doi: 10.1080/00039890409605170

## **Inaccurate jobs claims, increased crime rates, threats to property values and mortgages, and local government burden**

*According to multiple studies in multiple states, the oil and gas industry's promises of job creation from drilling for natural gas have been greatly exaggerated. Many of the jobs are short-lived, have gone to out-of-area workers, and, increasingly, are lost to automation. With the arrival of drilling and fracking operations, communities have experienced steep increases in rates of crime, variously including assault, rape, sex trafficking, larceny, and auto theft. In the Marcellus Shale region, violent crime increased 30 percent in counties that experienced a fracking boom compared to those without fracking. Aggravated and sexual assaults were the crimes primarily responsible for this increase. Crime rates have increased even with additional allocation of funds for public safety. Financial and other strains on municipal services include those on law enforcement, road maintenance, emergency services, and public school district administration. In Texas alone, road damage and other transportation impacts costs an estimated \$1.5-\$2 billion a year. In shale boom areas across the United States, school districts report heightened stress, regardless of whether student funding increased or decreased. Economists are increasingly quantifying community quality of life impacts and the unequal distribution of costs and benefits associated with drilling and fracking. Drilling and fracking pose an inherent conflict with mortgages and property insurance due to the hazardous materials used and the associated risks. With the departure of drilling and fracking operations from these communities, some of the challenges are eased. However, such departures can also lead to additional economic harms, such as by sharp upticks in foreclosures, late car and mortgage payments, empty housing units, and failed or diminished local businesses.*

- March 14, 2019 – A Canadian team reviewed the research published between 2009–2018 on the impacts on communities of “the whole suite of technologies that aid in the exploration, extraction, and transportation” of natural gas. This first review of impacts across the supply chain found most of the studies addressed upstream communities (those adjacent to the gas extraction), and that midstream and downstream communities were understudied. Midstream communities were those located in transportation corridors, such as near pipelines, and downstream communities were those near processing and shipping facilities. The study identified 28 community impacts across four broad categories: environmental impacts; impacts to infrastructure and service delivery; impacts on policy, regulation, and participation in decision-making; and socioeconomic impacts. In each area, the reviewers identified common findings, mixed results across studies, and research gaps. For social service delivery, for example, the review found significant effects from the boom and bust cycles. In the boom cycle these included “increased pressure on limited infrastructure, affordable housing and daycare, recreational and child/youth programs, and social services to address alcohol and drug addictions, domestic violence, and crime.” In the bust cycle there is a continued need for social services, especially as created by unemployment, economic hardship, local business closures, dropping property values, and out-migration. In this period though, there may

be cuts to social services, and “peer-reviewed articles rarely focused on the capacity of local governments to address impacts before, during, and after they happen.”<sup>1258</sup>

- December 10, 2018 – Although Pennsylvania has been able to realize modest short-term economic growth from fracking, policy researchers found that the state has also allowed costs to be externalized to public health, the environment, and community integrity. Despite emerging evidence on adverse public health effects, there remain significant uncertainties about these externalized costs, especially with regard to the long term. Research done in the state has shown “significant remaining uncertainties in detecting and attributing responsibility for groundwater contamination” associated with fracking. Intensive gas extraction in Pennsylvania can strain communities by several pathways: increased demand for emergency medical and mental health services; loss of housing for low income residents displaced by temporary, out-of-state workers; and increased traffic violations and arrests for driving under the influence. Emergencies at fracking sites can also strain or exceed the capabilities of local emergency response organizations. At the state level, policy weaknesses include failure to mandate the disclosure of fracking chemicals, failure to exercise adequate inspection and enforcement, and failure to institutionalize “stewardship of rents extracted from a nonrenewable resource for future generations.”<sup>1259</sup>
- November 21, 2018 – The presence of drilling and fracking operations is linked with fewer visits to overnight recreation sites in National Forests in western states. As part of a USDA Forest Service study that analyzed visitor use data from 27 National Forests with 722 overnight use areas, researchers found that, on average, each additional oil or gas well within a five-kilometer radius of a site was linked to six fewer visits annually. Within a five-kilometer radius, the distance between the well and the campground was not a significant factor. The researchers did not speculate on the overall user experience but wrote that their results do “suggest that the presence of oil and gas development may have a significant enough effect on the user experience to motivate users to recreate elsewhere.”<sup>1260</sup>
- October 28, 2018 – In 15 states between 2000 and 2013, intensive shale oil and gas drilling activity was linked with 41,760 fewer students enrolled in school per year in grades 11 and 12. This phenomenon was greatest in states with a younger compulsory schooling age (16 years of age instead of 17 or 18), in states with a lower effective tax rate on oil and gas production, and in rural counties with traditional mining or persistent poverty.<sup>1261</sup> The results of the study, conducted by a team of economists, aligned with

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<sup>1258</sup> Buse, C. G., Sax, M., Nowak, N., Jackson, J., Fresco, T., Fyfe, T., & Halseth, G. (2019). Locating community impacts of unconventional natural gas across the supply chain: A scoping review. *The Extractive Industries and Society*, 6(20), 620-629. doi: 10.1016/j.exis.2019.03.002

<sup>1259</sup> Chalfant, B. A., & Corrigan, C. C. (2019). Governing unconventional oil and gas extraction: The case of Pennsylvania. *Review of Policy Research*, 36(1). Advance online publication. doi: 10.1111/ropr.12319

<sup>1260</sup> Rasch, R., Reeves, M., & Sorenson, C. (2018). Does oil and gas development impact recreation visits to public lands? A cross-sectional analysis of overnight recreation site use at 27 national forests with oil and gas development. *Journal of Outdoor Recreation and Tourism*. 24, 45-51. doi: 10.1016/j.jort.2018.11.001

<sup>1261</sup> Zuo, N., Schieffer, J., & Buck, S. (2019). The effect of the oil and gas boom on schooling decisions in the U.S. *Resource and Energy Economics*, 55, 1-23. doi: 10.1016/j.reseneeco.2018.10.002

historical evidence from the 1970s energy boom as well as complementary research from the 2000s, both showing that oil and gas booms “can discourage educational attainment by increasing the opportunity cost for students to stay in school.” (See entry below for July 2015.)

- September 24, 2018 – An *E&E* investigation examined cities in North Dakota, Pennsylvania, and Oklahoma that are experiencing lingering financial and social disruptions following oil and gas booms. In Oklahoma, “the state Legislature is trying to fix what some viewed as a string of bad fiscal decisions that led to cuts in education and other services.” In Pennsylvania, communities are still roiled by “a series of bitter disputes about whether local landowners were getting their fair share of royalties from gas drilling.” In North Dakota, the debt held by the city of Williston was high for a town its size, with its manageability dependent on continuing oil tax income from the state.<sup>1262</sup>
- August 22, 2018 – Marking a decade since Marcellus Shale fracking began in earnest, a five-university research team presented a review of impacts to people, policy, and culture in the greater mid-Atlantic region of the United States. The review’s geographic and thematic sections address a range of impacts on Pennsylvania communities and a discussion of the less-studied communities in West Virginia and Ohio undergoing fracking. Economic impacts in Pennsylvania, contrary to what political and business interests typically tout, are mixed. Employment data showed that positive effects for local residents “are relatively small and temporary, in large part because much of the employment benefits from the activity goes to workers living outside the host communities.” Further, among local residents, economic benefits were unequally distributed based on land ownership. In Pennsylvania, about half of lease and royalty dollars accrue to the top 10 percent of local landowners who owned the most acreage, while the bottom 70 percent of landowners collectively receive only 2.8 percent of all such dollars. “The vast majority of local residents were not rural landowners and thus were unable to take advantage of gas leasing for revenue.” For poorer residents in fracking areas, “radically tightening housing markets, coupled with skyrocketing housing costs,” presented fundamental economic hardships.<sup>1263</sup>
- June 6, 2018 – Uneven distribution of economic/service-related benefits and social/environmental costs characterize the Barnett and the Eagle Ford shale plays in Texas, according to an analysis of shale energy development in the southern United States that included both objective and perceived effects. Transportation-related hazards, deemed “the big one,” were seen as the primary concern to community leaders and residents. Multiple sources and study types corroborated the objective transportation trends and harms. For example, a survey of county and city public officials in the 15-county Eagle Ford Shale region concluded that increasing transportation demands resulting from fracking “have not been met with needed state resources to maintain

<sup>1262</sup> Lee, M., & King, P. (2018, September 24). These places rode out the boom and bust. Now what? *E&E News*. Retrieved from <https://www.eenews.net/stories/1060099341>

<sup>1263</sup> Jacquet, J. B., Junod, A. N., Bugden, D., Wildermuth, G., Fergen, J. T., Jalbert, K., . . . Ladlee, J. (2018). A decade of Marcellus Shale: Impacts to people, policy, and culture from 2008 to 2018 in the Greater Mid-Atlantic region of the United States. *The Extractive Industries and Society*, 5, 596-609. doi: 10.1016/j.exis.2018.06.006

and/or upgrade transportation facilities to meet the increased volume and weight of vehicles using the transportation system in local communities.” An Academy of Medicine, Engineering and Science of Texas Task Force on Environmental and Community Impacts of Shale Development in Texas likewise concluded, “the level of funding to address the impacts to the transportation infrastructure and traffic safety in the oil and gas industry area is low relative to the magnitude of the impact.” This analysis also described uneven distribution of benefits. For example, individuals and energy companies located outside of the region held 96 percent of Eagle Ford mineral wealth.<sup>1264</sup>

- March 4, 2018 – Local governments in highly rural regions experiencing large-scale growth in oil and gas activity faced the greatest fiscal challenges, according to a study evaluating the effects of this development in 21 U.S. regions during boom and bust periods. “Increased crime, vehicle accidents, and other public safety issues were major challenges,” and “the scale of these challenges tended to track the scale of population growth and a region's rurality.” Though revenues from property and sales taxes and other sources resulted in a net gain for many local governments, the volatility of industry activity and population growth created especially difficult challenges for some municipalities. In a rural western Colorado city, for example, residents were faced with increased taxes, as well as increased water and wastewater fees to service the debt incurred by needed upgrades.<sup>1265</sup>
- February 13, 2018 – Economists found that Oklahoma home prices in 2006 to 2014 declined by three to four percent after experiencing a moderate earthquake. Further, sale prices for the properties affected by the most intense earthquakes were estimated to have declined from 3.5-10.3 percent. The study also found that houses were on the market significantly longer following earthquake exposure. The intensity of a quake for each property was determined by linking earthquake magnitude to the distance of the home from its epicenter. The researchers wrote, “Oklahoma provides an exceptional case study as the state most affected by sudden changes in seismic frequency and intensity,” and that although the exact proportion of earthquakes induced by oil and gas activity is not certain, “the Oklahoma Geological Survey has recognized that the majority of earthquakes are likely to be induced.” They concluded that the rise in earthquake activity “has inflicted substantial costs on homeowners in Oklahoma.”<sup>1266</sup>
- January 25, 2018 – In the Marcellus Shale region, counties experiencing a fracking boom suffered a 30 percent increase in violent crime, compared to those with no gas boom. Aggravated and sexual assaults were the crimes primarily responsible for this increase. This research took advantage of “natural experiment” conditions in the region, with a prohibition on fracking in New York State and a fracking boom across the border in Pennsylvania. The study used 2004 to 2012 county-level data from New York and

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<sup>1264</sup> Theodori, G. L. (2018). Shale energy development in the Southern United States: A review of perceived and objective social impacts. *The Extractive Industries and Society*, 5, 610-618. doi: 10.1016/j.exis.2018.05.006

<sup>1265</sup> Newell, R. G., & Raimi, D. (2018). The fiscal impact of increased U.S. oil and gas development on local governments. *Energy Policy*, 117, 14-24. doi: 10.1016/j.enpol.2018.02.042

<sup>1266</sup> Cheung, R., Wetherell, D., & Whitaker, S. (2018). Induced earthquakes and housing markets: Evidence from Oklahoma. *Regional Science and Urban Economics*, 69, 153-166. doi: 10.1016/j.regsciurbeco.2018.01.004

Pennsylvania Marcellus Shale regions, on unconventional gas wells drilled, and on seven “FBI Index I” offenses. The offenses were violent crimes (aggravated assault, rape, robbery, and murder) and property crimes (larceny, burglary, and auto theft). While violent crimes increased in fracking boom areas, property crimes did not. The research featured many controls to isolate the effects of the fracking economy on crime rates. In addition, “victimization costs” were estimated to be \$8.1 million per year in high fracking counties. “Policymakers along with oil and natural gas proponents often cite the benefits in terms of jobs and income that are created in a community. However, the welfare costs of victims of crimes, among other issues, should also be considered to make optimal policy decisions.”<sup>1267</sup>

- January 24, 2018 – The nearest full-time fire department to a deadly Quinton, Oklahoma natural gas rig explosion was nearly 30 miles away, according to an *E&E* investigation focusing on emergency response. “The deaths highlight a crucial fact of the drilling boom—much of it has occurred in rural areas where small-town police officers, sheriff’s deputies and volunteer firefighters are often the first responders.”<sup>1268</sup>
- January 13, 2018 – Sex trafficking in oil boomtowns remains a huge problem, according to interviews with 185 health and social service professionals, criminal justice personnel, industry and community representatives, and victims of violence in the Bakken oil field region. These results are reflective of the growing literature on the topic. Interviewees shared information on increases in domestic violence, dating violence, sexual assault, stalking, and sex trafficking. Findings demonstrated that sex trafficking was linked to “a confluence of underlying forces including big oil money, an increase in drug cartels and drug use, degradation of women in a male-dominated workforce, increased access to weapons, and a rise in transient populations.” A noteworthy contribution of this study was the documentation that participants felt unprepared to address the needs of victims of sex trafficking, having very few resources, and limited background and experience with these problems.<sup>1269</sup>
- December 12, 2017 – Fracking is unlikely to be a panacea for economically marginalized rural, suburban, or urban areas, and economic optimism regarding fracking tends to be overgeneralized, according to a study analyzing national data on socioeconomic wellbeing for the years 2000 to 2011. Researchers noted that large profits for industry and economic development “may not trickle down to residents living in high-production counties,” but instead often benefit a relative few, over a temporary time period. The study measured percentage of families below the poverty line in each county, average earnings, median household income, and employment status, to understand these socioeconomic impacts of oil and gas booms. Their literature review also uncovered a disparity in findings: “industry-funded studies have found substantial economic windfalls

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<sup>1267</sup> Komarek, T. M. (2018). Crime and natural resource booms: Evidence from unconventional natural gas production. *The Annals of Regional Science*, 61, 113-137. doi: 10.1007/s00168-018-0861-x

<sup>1268</sup> Lee, M., & Soraghan, M. (2018, January 24). Rig wreckage probed for cause of deadly Okla. blast. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060071777>

<sup>1269</sup> Heitkamp, T. (2018, January 13). Sex trafficking in the Bakken Oil Fields. Presented at Society for Social Work and Research, Washington, DC. Retrieved from <https://sswr.confex.com/sswr/2018/webprogram/Paper32717.html>



related to extraction... but the peer-reviewed literature suggests mixed or modest effects.”<sup>1270</sup>

- September 26, 2017 – The partial abandonment of the Eagle Ford Shale dramatically hurt small business owners, according to a report by *Bloomberg*. “As the shale drillers moved on to richer fields, the South Texas landscape became pockmarked with abandoned structures. This nimbleness—the ability to just pack up and leave at a moment’s notice—may give U.S. oil companies a competitive advantage against their more rigid state-run OPEC rivals, but there is a human cost to it all.” Concerning one tool and supply company in the region, the investigation found: “During the height of the Eagle Ford boom, R. Katz was supplying as many as 52 rigs and employing as many as 18 people in its office outside Cuero’s main strip. Today, it’s got 11 rig clients and three employees.”<sup>1271</sup>
- August 10, 2017 – Researchers from the independent, nonpartisan economic research group Resources for the Future studied the impacts of unconventional oil and gas booms on public school districts in the oil- and gas-producing states Pennsylvania, Ohio, West Virginia, North Dakota, Montana, and Colorado between 2000 and 2013. Using quantitative data analysis as well as extensive interviewing with parents and students in the districts, the study addressed the effects of recent oil and gas booms on student enrollment, teachers, public education finances, and student achievement metrics. Though divergent trends were found between school districts in the eastern versus western U.S., “nearly all boom districts reported heightened stress from financial volatility.” Though some districts had a statistically positive increase in per student funding while others had a decline, “the study found that greater revenues do not always translate into increased educational outcomes.... One western Colorado school district had to operate on a four-day-a week schedule and cut academic programs because of increased economic volatility.”<sup>1272</sup> As reported in *U.S. News and World Report*, “the boom-and-bust cycle of the industry was found to create overwhelming stress on local districts as students and teachers were moving in and out of a region to meet the economic demands of drilling.”<sup>1273</sup>
- June 18, 2017 – A Shale Task Force of the Academy of Medicine, Engineering and Science of Texas (TAMEST) developed the report, *Environmental and Community Impacts of Shale Development in Texas*, a “first-of-its-kind, comprehensive review of scientific research and related findings regarding impacts of shale oil and gas production

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<sup>1270</sup> Mayer, A., Olson-Hazboun, S. K., & Malin, S. (2018). Fracking fortunes: Economic wellbeing and oil and gas development along the urban-rural continuum. *Rural Sociology*, 83(3), 532-567. Advance online publication. doi: 10.1111/ruso.12198

<sup>1271</sup> Murtaugh, D. (2017, September 26). The oil ghost towns of Texas. *Bloomberg*. Retrieved from <https://www.bloomberg.com/news/features/2017-09-26/the-oil-ghost-towns-of-texas>

<sup>1272</sup> Ratledge, N., & Zachary, L. (2017). *Impacts of unconventional oil and gas booms on public education: A mixed-methods analysis of six producing states*. Retrieved from <http://www.rff.org/research/publications/impacts-unconventional-oil-and-gas-booms-public-education-mixed-methods>

<sup>1273</sup> Englert, E. (2017, August 10). Fracking brings challenges to local school systems. *U.S. News and World Report*. Retrieved from <https://www.usnews.com/news/national-news/articles/2017-08-10/fracking-brings-challenges-to-local-school-systems>

in Texas.” Transportation impacts included road damage costing Texas an estimated \$1.5 to \$2 billion a year, and rural crashes involving commercial vehicles increasing over 75 percent in some drilling regions. The number of fatal collisions in the Permian Basin doubled from 94 during 2006 to 2009, to 183 from 2010 to 2013. The report also noted that Texas is the only major oil and gas producing state without a “surface damage act” to protect landowners, who do not own the mineral rights on their land and have little control over oil and gas operations. The report, which also addressed topics such as seismicity, air, and water, noted that the various impacts of oil and gas development “can’t be studied or addressed in isolation.” Authors continued, “[t]hese connections are important and pervasive, but are not well-studied yet.” TAMEST includes all of the state’s Nobel Laureates, plus Texas-based members of the National Academies of Sciences, Engineering, and Medicine.<sup>1274</sup>

- April 6, 2017 – The economic impacts of fracking at the advent of the Marcellus Shale boom is an understudied topic. The onset of fracking was so rapid that academics were challenged to provide accurate and timely information to policymakers, and the one major paper that did appear in 2011 did not clearly disclose its industry sponsorship. A Pennsylvania Department of Community & Economic Development-funded study set out to investigate those early years. In addition to scrutinizing available data, the authors conducted a survey of 1,000 landowners in Bradford and Tioga counties, the two counties with the most fracked wells in Pennsylvania at the start of the boom. From the 501 returned surveys, they determined residents saved more than half of their earliest royalty and lease income, which “may or may not ultimately be spent within Pennsylvania.” Hence, the windfalls from mineral rights created “little economic impact during the year received.” Further, the study’s overall “lower-bound” estimate of economic impacts for 2009 found that fully 15.4 percent of these mineral rights were owned by non-residents. At the same time, survey results showed that 37 percent of the workforce consisted of non-residents with only half of their income staying in the state. This study’s upper-bound jobs count for 2009 was substantially lower than the estimates that made at the time. In addition, the study urged caution regarding future jobs predictions, as the sharp decline between 2011 and 2013 “was totally unexpected” and was not captured in a 2010 forecast for jobs in 2020.<sup>1275</sup>
- April 5, 2017 – Economists at Colorado State University quantified the “substantial environmental costs associated with hydraulic fracturing,” as part of an analysis of the market and non-market costs and benefits of fracking in 14 U.S. states. These costs were “dominated by \$27.2 billion (\$12.5–\$41.95 billion) health damages from air pollution.” They also found costs including “\$3.8 billion (\$1.15–\$5.89 billion) in greenhouse gas emissions, \$4 billion (\$3.5–\$4.45 billion) in wildlife habitat fragmentation, and \$1 billion (\$0.5–\$1.6 billion) in pollution of private drinking water wells.” Results also showed a disconnect between those reaping economic rewards from fracking and those paying the

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<sup>1274</sup> The Academy of Medicine, Engineering and Science of Texas. (2017). *Environmental and Community Impacts of Shale Development in Texas*. Retrieved from <http://tamest.org/shale-task-force/>  
doi: 10.25238/TAMESTstf.6.2017

<sup>1275</sup> Hoy, K. A., Kelsey, T. W., & Shields, M. (2017). An economic impact report of shale gas extraction in Pennsylvania with stricter assumptions. *Ecological Economics*, 138, 178-185. doi: 10.1016/j.ecolecon.2017.03.037

price: the “benefits” (mostly in the form of lower natural gas prices to residential, commercial, and industrial consumers) were geographically dispersed while the costs tended to concentrate in localized areas where drilling took place. Although the most comprehensive economic study to date, this analysis was not able to fully quantify all costs, including those related to water contamination (beyond surface-spill related costs for damage to private wells); diminishment of open spaces and aesthetics for community members; and seismic activity. The authors concluded that costs might well outweigh the benefits for suburban dwellers near fracking operations, as exemplified by Denton, Texas, where “nearly all the royalty money was flowing to mineral owners living elsewhere...rather than to adjacent homeowners.”<sup>1276</sup>

- February 19, 2017 – The *New York Times* reported on the oil and gas industry’s embrace of automation and its threat to preserving and bringing back jobs. Executives interviewed as part of the investigation were straightforward in their intentions to shrink their work forces. “‘We want to transform our work force to the point where we need to hire fewer people,’ said Joey Hall, Pioneer’s executive vice president for Permian Operations.” In 2016 Pioneer Natural Resources added 240 wells in West Texas without adding any new employees. A vice president at a Pennsylvania manufacturer of drilling rigs stated, “If it’s a repetitive task, it can be automated, and I don’t need someone to do that. I can get a computer to do that.”<sup>1277</sup>
- February 1, 2017 – Stanford University earth science professor Robert Jackson and two professors of law assessed how a new type of “conservation easement,” an established kind of legal agreement, could enable landowners to restrict fracking on their properties. A mineral estate conservation easement (MECE) can serve as a private landowner response to the demonstrable threats of fracking to property and community: “Accompanying the rise of high-volume hydraulic fracturing has been a suite of environmental and social concerns, including potential water and air contamination, greenhouse gas emissions, health effects, and community disruptions.” “We support the exploration of MECEs as an additional tool for landowners to exercise their rights and responsibilities,” the team concluded.<sup>1278</sup>
- January 26, 2017 – Automation is reducing the size of drilling crews and will lessen the number of jobs added nationally with any upturn in oil and gas operations, according to a piece on OilPrice.com. The author described predictions, including:

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<sup>1276</sup> Loomis, J., & Haefele, M. (2017). Quantifying market and non-market benefits and costs of hydraulic fracturing in the United States: A summary of the literature. *Ecological Economics*, 138, 160-167. doi: 10.1016/j.ecolecon.2017.03.036

<sup>1277</sup> Krauss, C. (2017, February 19). Texas oil fields rebound from price lull, but jobs are left behind. *New York Times*. Retrieved from [https://www.nytimes.com/2017/02/19/business/energy-environment/oil-jobs-technology.html?\\_r=0](https://www.nytimes.com/2017/02/19/business/energy-environment/oil-jobs-technology.html?_r=0)

<sup>1278</sup> Jackson, R. B., Owley, J., & Salzman, J. (2017). Mineral estate conservation easements: A new policy instrument to address hydraulic fracturing and resource extraction. *Environmental Law Reporter*, 47(2). 10112-10120. Retrieved from <https://elr.info/news-analysis/47/10112/mineral-estate-conservation-easements-new-policy-instrument-address-hydraulic-fracturing-and-resource-ext>

Automated drilling rigs may be able in the future to reduce the number of persons in a drilling crew by almost 40 percent, from 25 workers to 15 workers, *Houston Chronicle*'s Jordan Blum writes, quoting industry analysts.

Drilling company Nabors Industries expects that it may be able to reduce the size of the crew at each well site to around 5 people from 20 workers now if more automated drilling rigs are used, Bloomberg's David Wethe says.<sup>1279</sup>

- December 22, 2016 – Researchers with the Energy Policy Institute at the University of Chicago measured the costs and benefits of fracking in local communities across nine U.S. shale basins. They found that, despite contributions to local economies with the arrival of fracking, residents experienced decreases in local quality of life. Spikes in crime were the most directly measurable of these effects. “Despite local governments’ efforts to improve public safety—allocating 20 percent more funding—the crime rates still marginally increased.” The study also found unequal distribution of benefits. Students, the elderly, and those who don’t own mineral rights did not benefit at all. Their analysis found an average gain of about \$1,300 to \$1,900 per household per year, but these gains were offset by a reduction in the typical household’s quality of life, which the authors computed at about \$1,000 to \$1,600 per year.<sup>1280</sup>
- December 21, 2016 – Economists from the University of Anchorage and Montana State University studied the impact of regional shale energy booms on crime rates across U.S. counties from 2000 to 2013, documenting increased rates of many types of crime, including assault, rape, larceny, and auto theft. In 2013, they pegged the average monetary cost of these additional crimes at \$2 million per county. Researchers emphasized these results represented short-term costs only, as they could not predict how crimes rates and attendant costs will accrue over longer periods of time, as, for example, if criminal behavior and labor migration facilitate a slow drain of human and physical capital from the region and propagate “a long-term resource curse.” The study also found “that registered sex offenders moved in disproportionate numbers to boom towns in North Dakota,” and “that income inequality increased as the shale boom progressed.”<sup>1281</sup>
- May 24, 2016 – In 327 U.S. counties previously at the center of the fracking boom, overdue car loans approached their highest level in five years, and late mortgage payments also rose, according to a report by the *Financial Times* that examined data from the Federal Reserve Bank of New York. These trends stood in stark contrast to lowered overdue debt rates in the rest of the U.S. This surge in late car payments in intensely fracked areas of the United States has “exposed the damage done by the collapse in

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<sup>1279</sup> Paraskova, T. (2017, January 26). Robots over roughnecks: Next drilling boom might not add many jobs. *OilPrice.com*. Retrieved from <https://oilprice.com/Energy/Energy-General/Robots-Over-Roughnecks-Next-Drilling-Boom-Might-Not-Add-Many-Jobs.html>

<sup>1280</sup> Bartik, A. W., Currie, J., Greenstone, M., & Knittel, C. R. (2016). *The local economic and welfare consequences of hydraulic fracturing*. Energy Policy Institute at the University of Chicago. Retrieved from <https://epic.uchicago.edu/research/publications/local-economic-and-welfare-consequences-hydraulic-fracturing>

<sup>1281</sup> James, A., & Smith, B. (2016). There will be blood: Crime rates in shale-rich U.S. counties. *Journal of Environmental Economics and Management*, 84, 125–152. doi: 10.1016/j.jeem.2016.12.004

drilling activity and marred broadly positive trends for late debt payments by American consumers.”<sup>1282</sup>

- May 8, 2016 – With the downturn in the fracking industry, Wisconsin’s sand mining sector, which provides silica sand for fracking operations, has also slumped and prompted significant layoffs and job losses in both 2015 and 2016, according to a report by Eau Claire’s *Leader-Telegram*. “This is what the bust part of the boom-and-bust cycle of the energy sector looks like, and it’s something west-central Wisconsin residents, who are mostly new to the industry, aren’t used to seeing.” Other companies that supply goods and services to sand mining operations in the region have also experienced a downturn.<sup>1283</sup>
- March 8, 2016 – A DeWitt County, Texas judge estimated it will cost his county \$432 million to rebuild its roads, noting that if a road “leads to a rig site, it’s bound to be a broken road.” The judge stated that ultimately the companies would pay a large share.<sup>1284</sup>
- February 22, 2016 – *Inside Energy* investigated oil-industry related wage theft claims in the West, finding “a growing number of oil workers are turning to the courts, saying they weren’t paid fairly even when times were good.” Between 2010 and 2015, wage theft suits against oil and gas companies in Colorado increased by a factor of nine, and in Texas nearly ten times. The investigation found that oil and gas companies were consistently among the top violators of wage laws—especially in failure to pay overtime. A federal investigation of the industry led to the recovery of \$40 million dollars in unpaid wages. One of the officers involved in the investigations is quoted saying, “We have found cases where workers were not even paid the minimum wage, because they’re working so many hours.... So the idea that they’re being highly compensated, in some cases, they’re not.”<sup>1285</sup>
- January 13, 2016 – A fire on a fracking site in Grady County, Oklahoma that consumed 22 oil tankers required the response of six regional fire departments.<sup>1286</sup>
- December 15, 2015 – The value of homes that rely on well water in Pennsylvania dropped an average of \$30,167 when fracking took place within 1.5 kilometers, according to a study by Duke University researchers published in the *American Economic Review*. For these groundwater-dependent homes, a fracking well located within one kilometer was linked to a 13.9 percent average decrease in values; homes with wells at

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<sup>1282</sup> Fleming, S. (2016, May 24). US fracking bust sparks surge in car debt. *Financial Times*. Retrieved from <http://www.ft.com/cms/s/0/a4cb1270-21c2-11e6-aa98-db1e01fab0c.html>

<sup>1283</sup> Lindquist, E. (2016, May 8). Silent sandbox: Once booming frac sand industry continues major downturn. *Leader-Telegram*. Retrieved from <http://www.leadertelegram.com/News/Front-Page/2016/05/08/Silentsandbox.html>

<sup>1284</sup> Callahan, C. (2016, March 8). Fracking fall-off leaves South Texas roads a mess. *KSAT.com*. Retrieved from <http://www.ksat.com/web/ksat/news/fracking-fall-off-leaves-south-texas-roads-a-mess>

<sup>1285</sup> Boyce, D. (2016, February 22). Wage theft claims surge as oil prices fall. *Inside Energy*. Retrieved from <http://insideenergy.org/2016/02/22/wage-theft-claims-surge-as-oil-prices-fall/>

<sup>1286</sup> KFOR-TV, Querry, K., & Fultonberg, L. (2016, January 13). Firefighters extinguish damaging Grady Co. fracking fire. *KFOR.com*. Retrieved from <http://kfor.com/2016/01/13/all-lanes-of-traffic-shut-down-due-to-large-oil-rig-fire/>

least two kilometers away maintained their value. The study was based on home sales between 1995 and 2012 in 36 counties. Researchers stated that their figures may not fully reflect the total costs associated with groundwater contamination risk, as, for example, when homeowners purchase expensive home water filtration systems. Though their study does not incorporate data on actual contamination, concerns about contamination can significantly affect property values. Researchers found “strong evidence of localized costs borne particularly by groundwater-dependent homes.”<sup>1287</sup>

- December 8, 2015 – Even as housing prices in shale gas-areas of Pennsylvania have dropped along with fracking activity, many seniors and people living on low incomes are still being priced out of the market, *StateImpact* reported. Pennsylvania still lacks a quarter million affordable rental homes for people in poverty despite a 2012 law requiring gas companies to pay well fees intended to offset the costs of affordable housing programs in communities where drilling is occurring.<sup>1288</sup>
- December 2, 2015 – “The local economy is feeling the pinch” of the downturn of activity in Pennsylvania’s gas fields, according to a Reuters report. The late 2015 slump marked a turning point in Marcellus Shale fracking. Regional economic effects reported include empty hotel rooms and foreclosure notices in Lycoming County at their highest since data were first collected.<sup>1289</sup>
- October 7, 2015 – Vehicular collisions and Texas fracking activity are closely linked, according to a report by the Texas A&M University Transportation Institute. Researchers analyzed the number of crashes and injuries across Texas during the period from 2006 to 2009, when drilling and fracking operations were intensive over the Barnett Shale, as well as from 2010 to 2013, when activity increased in the Permian Basin in West Texas and the Eagle Ford Shale in South Texas, and decreased in the Barnett. Collisions increased where shale gas activity increased and decreased where it slowed down.<sup>1290</sup> Quoted in the *Texas Tribune*, report co-author Cesar Quiroga said, “The two trends correlated so well, and they were perfectly aligned . . . We could use this as a predictive model.”<sup>1291</sup> Further, the increase was greater in South Texas, the region that relies most heavily on horizontal, hydraulic fracking requiring millions of gallons of water and sand to be trucked in, compared to West Texas which does use fracking but also more simple, vertical wells. The comprehensive cost of these collisions was estimated to be about \$2

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<sup>1287</sup> Muehlenbachs, L., Spiller, E., & Timmins, C. (2015). The housing market impacts of shale gas development. *American Economic Review*, 105(12), 3633–3659. doi: 10.1257/aer.20140079

<sup>1288</sup> Cusick, M. (2015, December 8). Despite drilling slowdown, rents still high in fracking boomtowns. *StateImpact*. Retrieved from <https://stateimpact.npr.org/pennsylvania/2015/12/08/despite-drilling-slowdown-rents-still-high-in-fracking-boomtowns/>

<sup>1289</sup> McAllister, E. (2015, December 2). America's biggest gas field finally succumbs to downturn. *Reuters.com*. Retrieved from <http://www.reuters.com/article/us-usa-marcellus-decline-insight-idUSKBN0TL0CY20151202#W0DRBI8eM4MKscSV.97>

<sup>1290</sup> Quiroga, C. & Tsapakis, J. (2015). *Oil and gas energy developments and changes in crash trends in Texas*. Texas A&M Transportation Institute, PRC 15-35 F. Retrieved from <http://d2dtl5nnlpfr0r.cloudfront.net/tti.tamu.edu/documents/PRC-15-35-F.pdf>

<sup>1291</sup> Malewitz, J. (2015, October 7). Report: Energy boom-related traffic crashes cost billions. *Texas Tribune*. Retrieved from <https://www.texastribune.org/2015/10/07/report-shows-huge-toll-energy-boom-traffic-crashes/>

billion more from 2010 to 2013—in both the Eagle Ford and Permian Basin—compared to the previous period.

- September 30, 2015 – The North Dakota Bureau of Criminal Investigation was set to hire nine new agents, reported the *Billings Gazette*, “...allowing for more attention to cases of human trafficking and organized crime in western North Dakota ... as increased oil production resulted in growing populations.”<sup>1292</sup>
- September 29, 2015 – “New residential units sit empty as gas production falls,” *HousingWire Magazine* wrote, following up on their earlier reporting describing the link between the drilling boom and the real estate boom in the Bakken shale region of North Dakota. Economic data indicate that Bakken drilling is not lasting long enough to sustain the building explosion.<sup>1293</sup>
- September 9, 2015 – Most local governments in Western North Dakota and Eastern Montana’s Bakken region have experienced net negative fiscal effects, according to a Duke University analysis published by the National Bureau of Economic Research. These trends were also seen in municipalities in rural Colorado and Wyoming, which also struggled to manage fiscal impacts during recent oil and gas booms, but in these two states the fiscal impact eased as drilling activity slowed.<sup>1294</sup> Referencing the report, *McClatchyDC* wrote, “North Dakota cities and counties have been slammed.” Municipal challenges have included providing water and sewer infrastructure, substantial damage to roads, soaring housing prices, and strained emergency services.<sup>1295</sup>
- August 27, 2015 – Fracking in or near public parks could cause tourists to stay away and lead to a decline in park use, according to a report published by a team of tourism, recreation, and sport management researchers from the University of Florida, North Carolina State University, and Florida State University. Using data collected from 225 self-identified park users from Pennsylvania, Ohio, West Virginia, Kentucky, and Tennessee, researchers reported that only one-third of participants were willing to participate in recreational activities near fracking operations, compared to 38 percent unwilling, and 29 percent neutral. Forty-six percent of respondents supported a ban on fracking on public lands, while 20 percent agreed with promoting fracking on public lands.<sup>1296</sup>

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<sup>1292</sup> McCleary, M. (2016, September 30). North Dakota to hire 9 more criminal investigation agents. *Billings Gazette*. Retrieved from [http://billingsgazette.com/news/state-and-regional/montana/north-dakota-to-hire-more-criminal-investigation-agents/article\\_a4192344-c9b0-51cc-9693-5a4335f5be05.html](http://billingsgazette.com/news/state-and-regional/montana/north-dakota-to-hire-more-criminal-investigation-agents/article_a4192344-c9b0-51cc-9693-5a4335f5be05.html)

<sup>1293</sup> Lane, N. (2015, September 29). Is fracking about to bust housing in North Dakota? *HousingWire Magazine*. Retrieved from <http://www.housingwire.com/articles/35196-is-fracking-about-to-bust-housing-in-north-dakota>

<sup>1294</sup> Newell, R. G., & Raimi, D. (2015). *Shale public finance: Local government revenues and costs associated with oil and gas development*. The National Bureau of Economic Research, Working Paper No. 21542. doi: 10.3386/w21542

<sup>1295</sup> Cockerham, S. (2015, September 9). Oil boom a loser for North Dakota cities, counties, study finds. *McClatchyDC*. Retrieved from <http://www.mcclatchydc.com/news/nation-world/national/economy/article34552824.html>

<sup>1296</sup> Kellison, T. B., Bunds, K. S., Casper, J. M., & Newman, J. I. (2015). Fracking & parkland: Understanding the impact of hydraulic fracturing on public park usage. Retrieved from [http://plaza.ufl.edu/tkellison/\\_/Fracking.html](http://plaza.ufl.edu/tkellison/_/Fracking.html)

- July 1, 2015 – Britain’s Department for Environment, Food & Rural Affairs released previously redacted sections of a report on the impacts of drilling and fracking. The report found that housing prices near fracking wells would likely fall up to seven percent for houses within a mile of wells. Furthermore, properties within one to five miles of fracking sites could incur additional insurance costs. The report warned of environmental damages, including from leakage of fracking waste fluids, and found that public health could be affected indirectly through consumption of contaminated wildlife, livestock, or agricultural products. The report also found potential for some benefits, such as job growth.<sup>1297</sup>
- July 2015 – A working paper by researchers with the National Bureau of Economic Research found that fracking resulted in an increase in male teen high school dropout rates. “Our estimates imply that, absent fracking, the male-female gap in high school dropout rates among 17- 18-year olds would have narrowed by about 11 percent between 2000 and 2013 instead of remaining unchanged.” The authors explained that by increasing the demand for low-skilled labor, fracking could slow growth in educational attainment. They noted that the relative wage boost from fracking may be only temporary. Indeed, by the end of the sample period, the benefits had started to wane as the labor demand from fracking appeared to no longer favor dropouts. Thus, the fracking boom may be inhibiting educational achievement among young men who “would already be near the bottom of the skill distribution, with possible implications for future productivity and the social safety net.”<sup>1298, 1299</sup>
- March 20, 2015 – The U.S. Attorney for Western New York linked a rise in production of methamphetamine to use among workers in the fracking fields of northern and western Pennsylvania. Surging demand for the drug, which allows users to stay awake for 48 to 72 hours, may be related to the extremely long working hours that employees in the gas industry must endure.<sup>1300</sup>
- January 4, 2015 – A documentary by Forum News Service, “Trafficked Report,” revealed that sex trafficking, including of children, in the Bakken oil fields of North Dakota was a significant problem.<sup>1301</sup> The dynamics of the oil boom, with an influx of out-of-state and

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<sup>1297</sup> Vaughan, A. & Mason, R. (2015, July 1). Fracking could hurt house prices, health and environment, official report says. *Guardian*. Retrieved from <http://www.theguardian.com/environment/2015/jul/01/fracking-could-hurt-house-prices-health-and-environment-official-report-says>

<sup>1298</sup> Cascio, F. U., & Narayan, A. (2015, July). *Who needs a fracking education? The educational response to low-skill biased technological Change*. National Bureau of Economic Research. Retrieved from <http://www.nber.org/papers/w21359>

<sup>1299</sup> Chandra, S. (2015, July 14). Fracking jobs encouraged American teens to become high school dropouts. *Bloomberg Business*. Retrieved from: <http://www.bloomberg.com/news/articles/2015-07-14/fracking-jobs-encouraged-american-teens-to-become-high-school-dropouts>

<sup>1300</sup> Newberg, R. (2015, March 20). Meth use tied to fracking workers in Pennsylvania. *WIVB 4*. Retrieved from <http://wivb.com/2015/03/20/meth-use-tied-to-fracking-workers-in-pennsylvania/>

<sup>1301</sup> Dalrymple, A., & Lymn, K. (2015, January 4). Trafficked Report: Sex for sale in the Bakken. *Forum News Service*. Retrieved from <http://www.traffickedreport.com/?p=15>



primarily male workers far from their families, created an increase in demand for prostitution.<sup>1302</sup>

- December 28, 2014 – The *New York Times* profiled the impacts of oil drilling and fracking on the Fort Berthold Indian Reservation in North Dakota, finding corruption, crime, and negative environmental impacts. Aside from a significant rise in jobs, which often go to transient workers, many residents “see deterioration rather than improvement in their standard of living. They endure intense truck traffic, degraded roads, increased crime, strained services and the pollution from spills, flares and illegal dumping.” According to the *Times*’ calculation, the reservation had seen 850 oil-related environmental incidents from 2007 through mid-October 2014, which generally went unpunished.<sup>1303</sup>
- December 26, 2014 – Examining Pennsylvania Department of Transportation data, Ohio’s *Star Beacon* newspaper found that fracking poses a safety threat on rural roads. The paper found that Pennsylvania’s five busiest drilling counties recorded 123 more heavy truck crashes in 2011 than before the gas boom began—a 107 percent increase. The paper noted the burden drilling and fracking placed on local communities and governments, including the strain on local emergency responders.<sup>1304</sup>
- December 17, 2014 – Heavy drilling and fracking (defined as 400 or more wells drilled within a county over 5-8 years) was positively correlated with increased crime, sexually transmitted diseases, and traffic fatalities, according to a report by the Multi-State Shale Research Collaborative.<sup>1305</sup> The report looked at the impacts in Pennsylvania, Ohio, and West Virginia, primarily finding statistically significant impacts in six heavily drilled counties in Pennsylvania. In those six counties, violent crime increased 17.7 percent—corresponding to about 130 more violent crimes in those counties in 2012—compared to a decrease in violent crime rates in both urban and rural non-drilling communities. Property crime increased 10.8 percent in those six counties, drug abuse rates rose 48 percent, and drunk-driving offenses rose 65 percent compared to 42 percent in rural areas with no drilling. The report found a statistically significant increase of 24 percent to 27 percent in rates of sexually transmitted diseases across drilling counties in all three states. Motor vehicle fatalities increased 27.8 percent in Pennsylvania’s six high-drilling

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<sup>1302</sup> Gaines, J. (2015, March 9). The oil boom in North Dakota now has a serious sex-trafficking problem. *Business Insider*. Retrieved from <http://www.businessinsider.com/north-dakota-sex-trafficking-prostitution-oil-boom-police-raid-2015-3>

<sup>1303</sup> Sontag, D., & McDonald B. (2014, December 28). In North Dakota, a tale of oil, corruption and death. *The New York Times*. Retrieved from <http://www.nytimes.com/2014/12/29/us/in-north-dakota-where-oil-corruption-and-bodies-surface.html>

<sup>1304</sup> Finnerty, J. (2014, December 26). Fracking’s biggest safety threat is on rural roads. *Star Beacon*. Retrieved from [http://www.starbeacon.com/news/fracking-s-biggest-safety-threat-is-on-rural-roads/article\\_bc48687a-8caf-11e4-b4d9-6382c924a6f9.html](http://www.starbeacon.com/news/fracking-s-biggest-safety-threat-is-on-rural-roads/article_bc48687a-8caf-11e4-b4d9-6382c924a6f9.html)

<sup>1305</sup> Price, M., Basurto, L., Herzenberg, S., Polson, D., Ward, S., & Wazeter, E. (2014, December). *The shale tipping point: The relationship of drilling to crime, traffic fatalities, STDs, and rents in Pennsylvania, West Virginia, and Ohio*. The Multi-State Shale Research Collaborative. Retrieved from <http://www.multistateshale.org/shale-tipping-point>

counties. The report found a modest increase in jobs, but noted that an influx of out-of-state workers at least partially explained the increases in traffic and crime.<sup>1306</sup>

- December 15, 2014 – A report written in French by Quebec’s Advisory Office of Environmental Hearings concluded that the environmental costs of fracking in the St. Lawrence Lowlands would outweigh the potential economic benefits. In a press release, the Advisory Office of Environmental Hearings concluded that fracking “would not be advantageous for Quebec because of the magnitude of the potential costs and externalities, compared to royalties that would be collected by Quebec. Other concerns also remain, including plans of social acceptability, legislation, and a lack of knowledge, particularly with respect to water resources.”<sup>1307</sup>
- October 30, 2014 – The *New York Times* profiled the profound impact heavy drilling has had on Glasscock County, Texas, including its farming community. Farmers described increases in trash, traffic accidents, clashes around farmers selling groundwater to drillers, and economic detriment. In many cases, acres of farmland around a drill site “will probably never be suitable for fertile farming again,” and farmers are “at the mercy” of what drillers want to pay for damages. The county itself receives revenue, but most of that additional money “is being used to repair roads damaged by oil field truck activity. Overall, the gains from drilling are not viewed as worth the drawbacks in a county long dominated by cotton farming.”<sup>1308</sup>
- September 28, 2014 – A *Washington Post* investigation reported on heroin and methamphetamine addiction—and associated violent crime—among Native American communities located within the Bakken Shale oil fields. According to a chief judge for the Mandan, Hidatsa, and Arikara Nation, “The drug problem that the oil boom has brought is destroying our reservation.”<sup>1309</sup>
- September 11, 2014 – An editor for the *Washington Post* examined jobs and manufacturing data in Youngstown, Ohio, to demonstrate that drilling and fracking are not resulting in a revitalization of the Rust Belt as some proponents and a prominent *New York Times* story asserted. The *Post* determined that in Youngstown, Ohio, the manufacturing sector has lost jobs by the tens of thousands in the last twenty years and the oil and gas industry has created approximately two thousand jobs since the recession

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<sup>1306</sup> McKelvey, W. (2014, December 17). Fracking brought spikes in crime, road deaths and STDs to Pa.: Report. *Patriot News*. Retrieved from

[http://www.pennlive.com/midstate/index.ssf/2014/12/fracking\\_brought\\_spikes\\_in\\_vio.html](http://www.pennlive.com/midstate/index.ssf/2014/12/fracking_brought_spikes_in_vio.html)

<sup>1307</sup> McCarthy, S. (2014, December 15). Fracking dealt another setback by Quebec report. *Globe and Mail*.

Retrieved from <http://www.theglobeandmail.com/report-on-business/industry-news/energy-and-resources/bape-says-shale-gas-production-not-advantageous-for-quebec/article22096203/>

<sup>1308</sup> Batheja, A. (2014, October 30). A county resents oil drilling, despite the money it brings in. *The New York Times*. Retrieved from [http://www.nytimes.com/2014/10/31/us/a-county-resents-oil-drilling-despite-the-money-it-brings-in.html?ref=earth&\\_r=1](http://www.nytimes.com/2014/10/31/us/a-county-resents-oil-drilling-despite-the-money-it-brings-in.html?ref=earth&_r=1)

<sup>1309</sup> Horwitz, S. (2014, September 28). Dark side of the boom: North Dakota’s oil rush brings cash and promise to reservation along with drug-fueled crime. *The Washington Post*. Retrieved from <http://www.washingtonpost.com/sf/national/2014/09/28/dark-side-of-the-boom/>

ended. Six years prior, there were 13,000 more jobs in the Youngstown metro area than there were in summer 2014.<sup>1310</sup>

- September 9, 2014 – A study by researchers at Colorado State University examined the political economy of harm and crime associated with the oil and gas industry in rural Colorado, particularly around the rise of fracking. The researchers looked at complaints that citizens filed with the state, and also conducted interviews and examined other data. They found 2,444 complaints between November 2001 and June 2013 covering a range of issues including water, environment, noise, air quality, land use, and more. They characterized citizen complaints as “extensive and complex” and concluded that, regardless of the nature of the harm, most were “persistent and omnipresent” rather than short-lived, isolated problems.<sup>1311</sup>
- September 6, 2014 – In Williams County, North Dakota, in the Bakken Shale, increases in crime have corresponded with the flow of oil. The infusion of cash has attracted career criminals who deal in drugs, violence, and human sex trafficking. The *Williston Herald* portrayed, in a “reader’s discretion advised” article, the rapid rise of “index crimes”—“violent crimes that result in the immediate loss of an individual’s property, health or safety, such as murder, larceny and rape.” With fewer than 100 law enforcement personnel, crime in Williams County “has risen in kind with the county’s population, but funding, staffing and support training for law enforcement has not.”<sup>1312</sup>
- September 2014 – Reporting on the social, environmental, health and safety, and economic burdens endured by localities from fracking, the magazine *Governing: The States and Localities* found that “fracking, in many cases, negatively impacts property values, which in turn depresses property tax revenue. For property owners who own the rights to the oil and gas on their land, the effects of drilling can be offset by royalty payments. But localities have no revenue offset if properties lose value.”<sup>1313</sup>
- August 26, 2014 – The U.S. Justice Department Office on Violence Against Women awarded three million dollars to five rural and tribal communities to prosecute crimes of violence against women and provide services to victims of sexual assault, domestic violence, and stalking in the Bakken Region of North Dakota and Montana.<sup>1314</sup> Rationale documented by tribal leaders, law enforcement, and the FBI included, “rapid

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<sup>1310</sup> Tankersley, J. (2014, September 11). Fracking hasn’t restored the Rust Belt’s lost jobs. *The Washington Post*. Retrieved from <http://www.washingtonpost.com/news/storyline/wp/2014/09/11/fracking-hasnt-restored-the-rust-belts-lost-jobs/>

<sup>1311</sup> Opsal, T., & Shelley T. O. (2014). Energy crime, harm, and problematic state response in Colorado: A case of the fox guarding the hen house? *Critical Criminology*, 22 (4), 561-577.

<sup>1312</sup> Bell, T. (2014, September 6). Modernized slavery. *Williston Herald*. Retrieved from [http://www.willistonherald.com/news/modernized-slavery/article\\_84e257d8-3615-11e4-a4f8-001a4bcf887a.html](http://www.willistonherald.com/news/modernized-slavery/article_84e257d8-3615-11e4-a4f8-001a4bcf887a.html)

<sup>1313</sup> Shafroth, F. (2014, September). Fracking’s financial losers: local governments. *Governing: The States and Localities*. Retrieved from <http://www.governing.com/columns/public-money/gov-frackings-financial-losers.html>

<sup>1314</sup> U.S. Department of Justice. (2014, August 26). Associate Attorney General West announces \$3 million in grants to address violence against women in rural and tribal communities in the Bakken Region. *Justice News*. Retrieved from <http://www.justice.gov/opa/pr/associate-attorney-general-west-announces-3-million-grants-address-violence-against-women>

development of trailer parks and modular housing developments often referred to as ‘man camps;’ abrupt increase in cost of living, especially housing; rapid influx of people, including transients, in a previously rural and stable community; constant fear and perception of danger; and a lost way of life. Local and tribal officials and service providers reported that these changes have been accompanied by a rise in crime, including domestic and sexual violence.”<sup>1315</sup>

- May 27, 2014 – A *Bloomberg News* analysis of 61 shale-drilling companies found that the economic picture of shale oil and gas is unstable. Shale debt has almost doubled over the last four years while revenue has gained just 5.6 percent. For the 61 companies in their analysis, *Bloomberg News* reported: “In a measure of the shale industry’s financial burden, debt hit \$163.6 billion in the first quarter.” Further, *Bloomberg* noted that drillers are caught in a bind because they must keep borrowing to pay for exploration needed to “offset steep production declines typical of shale wells.... For companies that can’t afford to keep drilling, less oil coming out means less money coming in, accelerating the financial tailspin.”<sup>1316</sup>
- May 5, 2014 – An Associated Press analysis found that traffic fatalities have spiked in heavily drilled areas of six states, whereas most other roads in the nation have become safer even as population has grown. In North Dakota drilling counties, for instance, traffic fatalities have increased 350 percent.<sup>1317</sup>
- April 16, 2014 – A comprehensive article in the *Albany Law Review* concluded that the risks inherent with fracking are not covered by homeowner’s insurance, not fully insured by the oil and gas industry, and threaten mortgages and property value.<sup>1318</sup>
- April 2014 – A report by the Multi-State Shale Research Collaborative, “Assessing the Impacts of Shale Drilling: Four Community Case Studies,” documented economic, community, government, and human services impact of fracking on four rural communities. The study found that fracking led to a rapid influx of out-of-state workers and, although some new jobs were created, these were accompanied by additional costs for police, emergency services, road damage, and social services. In addition, increased rents, and a shortage of affordable housing accompanied the fracking boom.

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<sup>1315</sup> U.S. Department of Justice. (2014). OVW Fiscal Year 2014 Violence Against Women Bakken Region Initiative: Enhanced response to victims application guidelines. Retrieved from <http://www.justice.gov/sites/default/files/ovw/legacy/2014/04/25/fy2014-initiative-for-the-bakken-region-enhanced-services-for-victims.pdf>

<sup>1316</sup> Loder, A. (2014, May 27). Shakeout threatens shale patch as frackers go for broke. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2014-05-26/shakeout-threatens-shale-patch-as-frackers-go-for-broke.html>

<sup>1317</sup> Begos, K., & Fahey, J. (2014, May 5). AP impact: Deadly side effect to fracking boom. *Associated Press*. Retrieved from <http://bigstory.ap.org/article/ap-impact-deadly-side-effect-fracking-boom-0>

<sup>1318</sup> Radow, E. L. (2014). At the intersection of Wall Street and Main: Impacts of hydraulic fracturing on residential property interests, risk allocation, and implications for the secondary mortgage market. *Albany Law Review*, 77(2), 673-704.

Unemployment rose after one county's boom ended; in another county, unemployment stayed above the state average throughout.<sup>1319</sup>

- March 27, 2014 – A report by researchers at Rand Corporation determined that each shale gas well in Pennsylvania causes between \$5,400 and \$10,000 in damage to state roads. The report did not calculate damage to local roads, which is also significant. Researchers used estimates of truck trips that are significantly below the number estimated for New York by the New York State Department of Environmental Conservation (NYS DEC).<sup>1320, 1321</sup>
- February 15, 2014 – The *Los Angeles Times* detailed steep increases in crime that have accompanied fracking in parts of the Eagle Ford Shale in Texas, including sexual assaults and thefts.<sup>1322</sup>
- February 14, 2014 – Pennsylvania landowners with fracking leases rallied in Bradford County against gas companies for precipitous drops in royalty payments.<sup>1323</sup>
- December 20, 2013 – The National Association of Realtors' *RealtorMag* summarized a growing body of research, including a University of Denver survey and a *Reuters* analysis, that shows threats property values from fracking and gas drilling.<sup>1324</sup>
- December 12, 2013 – A *Reuters* analysis discussed how oil and gas drilling has made making some properties “unsellable” and researched the link between drilling and property value declines. The analysis highlighted a Duke University working paper that finds shale gas drilling near homes can decrease property values by an average of 16.7 percent if the house depends on well water.<sup>1325</sup>

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<sup>1319</sup> Multi-State Shale Research Collaborative. (2014, April 10). *Assessing the impacts of shale drilling county case studies* (Rep.). Retrieved from

<https://docs.google.com/viewer?a=v&pid=sites&srcid=ZGVmYXVsdGRvbWFpbntdWx0aXN0YXRlc2hhbGV8Z3g6NGU4MjIyNWU5ZjFhZjM4Yg>

<sup>1320</sup> Cusick, M. (2014, March 27). Report finds each Marcellus gas well costs thousands in road damage. *StateImpact*. Retrieved from <http://stateimpact.npr.org/pennsylvania/2014/03/27/report-finds-each-marcellus-gas-well-costs-thousands-in-road-damage/>

<sup>1321</sup> Abramzon, S., Samaras, C., Curtright, A., Litovitz, A., & Burger, N. (2014). Estimating the consumptive use costs of shale natural gas extraction on Pennsylvania roadways. *Journal of Infrastructure Systems*. 20(3). doi: 10.1061/(ASCE)IS.1943-555X.0000203, 06014001

<sup>1322</sup> Hennessy-Fiske, M. (2014, February 15). Fracking brings oil boom to south Texas town, for a price. *Los Angeles Times*. Retrieved from <http://www.latimes.com/nation/la-na-texas-oil-boom-20140216%2C0%2C7621618.story#ixzz30Iw9FXoz>

<sup>1323</sup> Marshall, J. (2014, February 14). Landowners rally for royalties from gas companies. Retrieved from <http://www.wbng.com/news/local/Landowners-rally-for-245596511.html>

<sup>1324</sup> Daily Real Estate News. (2013, December 20). ‘Fracking’ sparks concern over nearby home values. *National Association of Realtors*. Retrieved, from <http://realtormag.realtor.org/daily-news/2013/12/20/fracking-sparks-concern-over-nearby-home-values#.UrmdIIPmVu8.twitter>

<sup>1325</sup> Conlin, M. (2013, December 12). Gas drilling is killing property values for some Americans. *Reuters*. Retrieved from <http://www.businessinsider.com/drilling-can-make-some-properties-unsellable-2013-12#ixzz2nMgFv8FU>

- December 10, 2013 – Pennsylvania’s *Daily Review* reported that more gas companies are shifting costs to leaseholders and that royalty payments are drastically shrinking. The story quoted Bradford County Commissioner Doug McLinko saying that some gas companies “are robbing our landowners” and that the problem of royalty payments being significantly reduced by deductions for post-production costs “is widespread throughout our county.”<sup>1326</sup>
- November 30, 2013 – The *New York Times* reported striking increases in crime in Montana and North Dakota where the oil and gas boom is prevalent, as well as challenges faced by local residents from the influx of out-of-area workers and the accompanying costs. The *New York Times* reported, “‘It just feels like the modern-day Wild West,’ said Sgt. Kylan Klauzer, an investigator in Dickinson, in western North Dakota. The Dickinson police handled 41 violent crimes last year, up from seven only five years ago.”<sup>1327</sup>
- November 21, 2013 – The Multi-State Shale Research Collaborative released a six-state collaborative report demonstrating that the oil and gas industry has greatly exaggerated the number of jobs created by drilling and fracking in shale formations. The report found that far from the industry’s claims of 31 direct jobs created per well, only four jobs are created for each well. It also demonstrated that almost all of the hundreds of thousands of ‘ancillary’ jobs that the drilling industry claims are related to shale drilling existed before such drilling occurred. As Frank Mauro, Executive Director Emeritus of the Fiscal Policy Institute put it, “Industry supporters have exaggerated the jobs impact in order to minimize or avoid altogether taxation, regulation, and even careful examination of shale drilling.”<sup>1328</sup>
- November 12, 2013 – *The American Banker* reported that the “Fracking Boom Gives Banks Mortgage Headaches,” with a number of financial institutions refusing to make mortgages on land where oil and gas rights have been sold to an energy company. The article stated that the uniform New York state mortgage agreement used by Fannie Mae and Freddie Mac requires that homeowners not permit any hazardous materials to be used or located on their property. Fracking is therefore a problem because it is just such a hazardous activity with use of hazardous materials.<sup>1329</sup>
- September 25, 2013 – A report found that fracking is linked to significant road damage, increased truck traffic, crime, and strain on municipal and social services. Data from the

<sup>1326</sup> Loewenstein, J. (2013, December 10). Shrinking royalty checks. *The daily review.com*. Retrieved from <http://thedailyreview.com/news/shrinking-royalty-checks-1.1598195>

<sup>1327</sup> Healy, J. (2013, November 30). As oil floods plains towns, crime pours in. *The New York Times*. Retrieved from [http://www.nytimes.com/2013/12/01/us/as-oil-floods-plains-towns-crime-pours-in.html?smid=tw-share&\\_r=0](http://www.nytimes.com/2013/12/01/us/as-oil-floods-plains-towns-crime-pours-in.html?smid=tw-share&_r=0)

<sup>1328</sup> Campbell, J. (2013, November 21). Report: Industry-backed studies exaggerate fracking job estimates. *Politics on the Hudson*. Retrieved from <http://pol HUDSON.lohudblogs.com/2013/11/21/report-industry-backed-studies-exaggerate-fracking-job-estimates/>

<sup>1329</sup> Peters, A. (2013, November 12). Fracking boom gives banks mortgage headaches. *American Banker*. Retrieved from [http://www.americanbanker.com/issues/178\\_218/fracking-boom-gives-banks-mortgage-headaches-1063561-1.html](http://www.americanbanker.com/issues/178_218/fracking-boom-gives-banks-mortgage-headaches-1063561-1.html)

past ten years on the social costs of fracking including truck accidents, arrests, and higher rates of sexually transmitted diseases are all causes for alarm.<sup>1330</sup>

- September 12, 2013 – In a feature titled “Pa. fracking boom goes bust,” *The Philadelphia Inquirer* presented data from the independent Keystone Research Center detailing “flat at best” job growth and declines in production and royalty payments.<sup>1331</sup>
- August 22, 2013 – A University of Denver study in the *Journal of Real Estate Literature* found a 5-15 percent reduction in bid value for homes near gas drilling sites.<sup>1332</sup>
- August 21, 2013 – *The Atlantic Cities* and *MSN Money* reported that fracking operations may be damaging property values and may impair mortgages or the ability to obtain property insurance.<sup>1333, 1334</sup>
- August 13, 2013 – A *ProPublica* investigative analysis found that Chesapeake Energy is coping with its financial difficulties in Pennsylvania by shifting costs to landowners who are now receiving drastically reduced royalty payments.<sup>1335</sup>
- August 4, 2013 – In a survey of West Virginia landowners with shale wells on their property, more than half reported problems including damage to the land, decline in property values, truck traffic, and lack of compensation by the oil and gas company.<sup>1336</sup>
- May 24, 2013 – Pennsylvania Department of Transportation Secretary Allen D. Buihler and Pennsylvania State Police Commissioner Frank Pawlowski said that gas drilling has led to increases in truck traffic, traffic violations, crime, demand for social services, and the number of miles of roads that are in need of repairs. They noted that drilling companies that committed to repairing roads have not kept pace with the roads they

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<sup>1330</sup> Gibbons, B. S. (2013, September 25). Environmental groups calculate social cost of natural gas boom. *The Times-Tribune*. Retrieved from <http://thetimes-tribune.com/news/environmental-groups-calculate-social-cost-of-natural-gas-boom-1.1558186>

<sup>1331</sup> Bunch, W. (2013, September 12). Pa. fracking boom goes bust. *Philly.com*. Retrieved from [http://articles.philly.com/2013-09-12/news/41974274\\_1\\_fracking-boom-penn-state-marcellus-center-marcellus-shale](http://articles.philly.com/2013-09-12/news/41974274_1_fracking-boom-penn-state-marcellus-center-marcellus-shale)

<sup>1332</sup> Downing, B. (2013, April 22). Survey says home values hurt by fracking at drill sites. *Ohio.com*. Retrieved from <http://www.ohio.com/blogs/drilling/ohio-utica-shale-1.291290/survey-says-home-values-hurt-by-fracking-at-drill-sites-1.422838>

<sup>1333</sup> Drouin, R. (2013, August 19). How the fracking boom could lead to a housing bust. *Citylab*. Retrieved from <http://www.theatlanticcities.com/politics/2013/08/how-fracking-boom-could-lead-housing-bust/6588/>

<sup>1334</sup> Notte, J. (2013, August 21). Fracking leaves property values tapped out. *MSN Money*. Retrieved from <http://money.msn.com/now/post--fracking-leaves-property-values-tapped-out>

<sup>1335</sup> Lustgarten, A. (2013, August 13). Unfair share: How oil and gas drillers avoid paying royalties. *ProPublica*. Retrieved from <http://www.propublica.org/article/unfair-share-how-oil-and-gas-drillers-avoid-paying-royalties>

<sup>1336</sup> Collins, A. R., & Nkansah, K. (2013, August 4). *Divided rights, expanded conflict: The impact of split estates in natural gas production* [Scholarly project]. Retrieved from [http://ageconsearch.umn.edu/bitstream/150128/2/Collins\\_Nkhsah\\_Split%20estate.pdf](http://ageconsearch.umn.edu/bitstream/150128/2/Collins_Nkhsah_Split%20estate.pdf)

damage. Commissioner Pawlowski reported that 56 percent of 194 trucks checked were over the legal weight limit and 50 percent were also cited for safety violations.<sup>1337</sup>

- May 4, 2013 – Pennsylvania’s *Beaver County Times* asked, “What boom?” in pointing to Keystone Research Center data showing that the number of jobs numbers created by shale gas extraction do not add up to what the gas industry claims, noting that unemployment has increased and the state actually fell to 49<sup>th</sup> in the nation for job creation.<sup>1338</sup>
- April 2, 2013 – The *New York Times* reported that manufacturing jobs resulting from an abundance of shale gas have not appeared. “The promised job gains, other than in the petrochemical industry, have been slow to materialize,” The *New York Times* reported. The article suggested that increased automation has made it unlikely that manufacturers will add many jobs.<sup>1339</sup>
- March 19, 2013 – The *Wall Street Journal* reported that the shale gas boom has not had a big impact on U.S. manufacturing because lower energy prices are only one factor in a company’s decision on where to locate factories, and not always the most important factor. “Cheap energy flowing from the U.S. shale-gas boom is often touted as a ‘game changer’ for manufacturing,” the *Journal* reported. “Despite the benefits of lower energy costs, however, the game hasn’t changed for most American manufacturers.”<sup>1340</sup>
- February 2013 – A peer-reviewed analysis of industry-funded and independent studies on the economics of fracking found that it is unlikely that fracking will lead to long-term economic prosperity for communities. The analysis noted that shale gas development brings a number of negative externalities including the potential for water, air, and land contamination; negative impacts on public health; wear and tear on roads and other infrastructure; and costs to communities due to increased demand for services such as police, fire departments, emergency responders, and hospitals.<sup>1341</sup>

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<sup>1337</sup> PR Newswire. (2014, May 24). Increased gas drilling activities bringing new challenges to local governments in Pennsylvania. *PR Newswire*. Retrieved from <http://www.prnewswire.com/news-releases/increased-gas-drilling-activities-bringing-new-challenges-to-local-governments-in-pennsylvania-94774764.html>

<sup>1338</sup> Morgan, R. (2013, May 4). Beaver County Times: What boom? Industry pundits claim thousands of jobs will be created, but numbers don't quite add up. *Keystone Research Center*. Retrieved from <http://keystoneresearch.org/media-center/media-coverage/beaver-county-times-what-boom-industry-pundits-claim-thousands-jobs-will>

<sup>1339</sup> Schwartz, N. D. (2013, April 01). Rumors of a cheap-energy jobs boom remain just that. *The New York Times*. Retrieved from [http://www.nytimes.com/2013/04/02/business/economy/rumors-of-a-cheap-energy-jobs-boom-remain-just-that.html?\\_r=0](http://www.nytimes.com/2013/04/02/business/economy/rumors-of-a-cheap-energy-jobs-boom-remain-just-that.html?_r=0)

<sup>1340</sup> Hagerty, J. R. (2013, March 19). Shale-gas boom alone won't propel U.S. industry. *The Wall Street Journal*. Retrieved from <http://online.wsj.com/news/articles/SB10001424127887324392804578362781776519720>

<sup>1341</sup> Barth, J. M. (2013). The economic impact of shale gas development on state and local economies: Benefits, costs, and uncertainties. *New Solutions: A Journal of Environmental and Occupational Health Policy*, 23(1), 85-101. doi: 10.2190/NS.23.1.f



- November 16, 2012 – A Duke University study showed a drop in home values near fracking for properties that rely on groundwater.<sup>1342</sup>
- September 27, 2012 – The *New York Times* reported that the prospect of fracking has hindered home sales in the Catskills and raised concerns about drops in property values, according to real estate agents and would-be buyers.<sup>1343</sup>
- August 17, 2012 – A study by the state agencies, the Montana All Threat Intelligence Center and the North Dakota State and Local Intelligence Center, found that crime rose by 32 percent since 2005 in communities at the center of the oil and gas boom.<sup>1344</sup>
- October 30, 2011 – A comprehensive article in the *New York State Bar Association Journal* concluded that the risks inherent with fracking threaten mortgages.<sup>1345</sup>
- October 26, 2011 – The Associated Press reported that areas with significant fracking activity, including Pennsylvania, Wyoming North Dakota and Texas, are “seeing a sharp increase in drunken driving, bar fights and other hell-raising.”<sup>1346</sup>
- October 19, 2011 – A *New York Times* investigation found that fracking can create conflicts with mortgages, and that “bankers are concerned because many leases allow drillers to operate in ways that violate rules in landowners’ mortgages,” and further that “[f]earful of just such a possibility, some banks have become reluctant to grant mortgages on properties leased for gas drilling. At least eight local or national banks do not typically issue mortgages on such properties, lenders say.”<sup>1347</sup>
- September 7, 2011 – The NYS DEC estimated that 77 percent of the workforce on initial shale gas drilling projects would consist of transient workers from out of state. Not until the thirtieth year of shale gas development would 90 percent of the workforce be comprised of New York residents.<sup>1348</sup>

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<sup>1342</sup> Muoio, D. (2012, November 16). Duke researchers show dip in home value caused by nearby fracking. *The Chronicle*. Retrieved from <http://www.dukechronicle.com/articles/2012/11/16/duke-researchers-show-dip-home-value-caused-nearby-fracking>

<sup>1343</sup> Navarro, M. (2012, September 27). Gas drilling jitters unsettle Catskills sales. *The New York Times*. Retrieved from <http://www.nytimes.com/2012/09/30/realestate/fracking-fears-hurt-second-home-sales-in-catskills.html?pagewanted=1>

<sup>1344</sup> Montana All Threat Intelligence Center, & North Dakota State and Local Intelligence Center. (2012, August 17). *Impact of population growth on law enforcement in the Williston Basin region* (Rep.). Retrieved from <http://www.ag.nd.gov/reports/JOINTPRODUCTFINAL.pdf>

<sup>1345</sup> Radow, E. N. (2011). Homeowners and gas drilling leases: Boon or bust? *New York State Bar Association Journal*, 83(9). Retrieved from [http://www.s-oacc.org/resources/NYSBA\\_Journal\\_nov-dec2011\\_lead\\_article\\_with\\_reprint\\_info.pdf](http://www.s-oacc.org/resources/NYSBA_Journal_nov-dec2011_lead_article_with_reprint_info.pdf)

<sup>1346</sup> Levy, M. (2011, October 26). Towns see crime, carousing surge amid gas boom. *Associated Press*. Retrieved from <http://news.yahoo.com/towns-see-crime-carousing-surge-amid-gas-boom-135643480.html>

<sup>1347</sup> Urbina, I. (2011, October 19). A rush to sign leases for gas runs into mortgage restriction. *The New York Times*. Retrieved from [http://www.nytimes.com/2011/10/20/us/rush-to-drill-for-gas-creates-mortgage-conflicts.html?\\_r=2&hp&](http://www.nytimes.com/2011/10/20/us/rush-to-drill-for-gas-creates-mortgage-conflicts.html?_r=2&hp&)

<sup>1348</sup> New York State Department of Environmental Conservation. (2011). *Supplemental generic environmental impact statement on the oil, gas and solution mining regulatory program, well permit issuance for horizontal*

- August 15, 2011 – The *Pittsburgh Post-Gazette* reported that increases in crime followed the Pennsylvania gas drilling boom, noting, for instance, that drunken driving arrests in Bradford County were up 60 percent, DUI arrests were up 50 percent in Towanda, and criminal sentencing was up 35 percent in 2010.<sup>1349</sup>
- July 26, 2011 – A New York State Department of Transportation document estimated that fracking in New York could result in the need for road repairs and reconstruction costing \$211 million to \$378 million each year.<sup>1350</sup>
- June 20, 2011 – A Keystone Research Center study found that the gas industry’s claim of 48,000 jobs created between 2007 and 2010 as a result of natural gas drilling in Pennsylvania is a far cry from the actual number of only 5,669 jobs—many of which were out-of-state hires.<sup>1351</sup>
- May 9, 2011 – A study in the *Journal of Town & City Management* found that shale gas development can impose “significant short- and long-term costs” to local communities. The study noted that shale gas development creates a wide range of potential environmental hazards and stressors, all of which can adversely impact regional economies, including tourism and agriculture sectors.<sup>1352</sup>
- November 30, 2010 – The *Dallas Morning News* featured a story, “Drilling Can Dig into Land Value,” reporting that the Wise County Central Appraisal District Appraisal Review Board found that a drilling company had caused an “extraordinary reduction” in property value, by 75 percent.<sup>1353</sup>
- November 28, 2010 – The Texas *Wise County Messenger* reported that some landowners near fracking operations experience excessive noise, exposure to diesel fumes, and problems with trespassing by workers.<sup>1354</sup>

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*drilling and high-volume hydraulic fracturing to develop the Marcellus shale and other low-permeability gas reservoirs* (6-233, 234, Rep.).

<sup>1349</sup> Needles, Z. (2011, August 15). Must crime follow Pennsylvania's gas drilling boom? *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/stories/business/legal/must-crime-follow-pennsylvanias-gas-drilling-boom-310373/>

<sup>1350</sup> Reilly, S. (2011, July 26). Document estimates fracking’s toll on N.Y. roads. *Pressconnects.com*. Retrieved from <http://www.pressconnects.com/article/20110726/NEWS01/107260384/Document-estimates-fracking-s-toll-N-Y-roads>

<sup>1351</sup> Herzenberg, S. (2011). Drilling deeper into job claims. Keystone Research Center. Retrieved from [http://keystoneresearch.org/sites/keystoneresearch.org/files/Drilling-Deeper-into-Jobs-Claims-6-20-2011\\_0.pdf](http://keystoneresearch.org/sites/keystoneresearch.org/files/Drilling-Deeper-into-Jobs-Claims-6-20-2011_0.pdf)

<sup>1352</sup> Christopherson, S. & Rightor, N. (2011). How shale gas extraction affects drilling localities: Lessons for regional and city policy makers. *Journal of Town & City Management*, 2(4), 1-20. Retrieved from [http://www.greenchoices.cornell.edu/downloads/development/shale/Economic\\_Effects\\_on\\_Drilling\\_Localities.pdf](http://www.greenchoices.cornell.edu/downloads/development/shale/Economic_Effects_on_Drilling_Localities.pdf)

<sup>1353</sup> Heinkel-Wolfe, P. (2010, September 18). Drilling can dig into land value. *Dallas News*. Retrieved from <http://www.dallasnews.com/incoming/20100918-Drilling-can-dig-into-land-value-9345.ece>

<sup>1354</sup> Evans, B. (2010, November 28). Rising volume: ‘Fracking’ has bolstered economies, but noise still echoes around drilling. *WCMessenger.com*. Retrieved from <http://www.wcmessenger.com/2010/news/rising-volume-fracking-has-bolstered-economies-but-noise-still-echoes-around-drilling/>

## **Inflated estimates of oil and gas reserves and profitability**

*Industry projections of oil and gas reserves and profitability of drilling have proven undependable. Over time, well production has become increasingly short-lived, which has led companies drilling shale to reduce the value of their assets by billions of dollars, creating shortfalls that are largely filled through asset sales and mounting debt load. Throughout the ten-year fracking boom, the industry as a whole has spent more money drilling wells than selling oil and gas. Beginning in 2014, a fall in oil and gas prices led to a two-year downturn in fracking operations. As interest payments consumed the revenue of many smaller companies, more than 70 U.S. oil and gas companies declared bankruptcy, and the number of oil and gas rigs declined by 75 percent or more. When companies abandoned operations, they also abandoned the wells they drilled, raising questions about who serves as the custodian of inactive wells and their associated infrastructure, now and hereafter.*

*Beginning in 2017, a modest recovery in prices brought renewed industry enthusiasm for fracking. However, because of the rapid depletion of individual shale wells and the falling output of major shale basins, including the Bakken and the Marcellus, operators must reinvest profits to drill new wells at an increasingly rapid pace just to maintain the same level of extraction. More than half of all U.S. oil is now produced by wells that are two years old or younger, and they are pumping less oil than forecast. In the first half of 2018, despite rising oil prices, fracking-focused companies continued to lose cash.*

*The need to stabilize economic fundamentals by increasing production and lower costs is contributing to the shift toward “mega-fracking,” with ever-longer laterals to allow one well to access more oil or gas—and with requirements for higher volumes of water, sand, and chemicals per well.*

- January 2, 2019 – An analysis by the *Wall Street Journal* comparing productivity estimates provided to investors with third-party projections revealed that thousands of shale wells are pumping considerably less oil and gas than owners were forecasting. Two-thirds of projections made by fracking companies between 2014-2017 in Texas and North Dakota oil basins were overly optimistic. All together, these companies are on track to extract 10 percent less oil and gas than they predicted. “The Journal’s findings suggest current production levels may be hard to sustain without greater spending because operators will have to drill more wells to meet growth targets.”<sup>1355</sup>
- October 17, 2018 – A research brief jointly published by the Institute for Energy Economics and Financial Analysis and the Sightline Institute tracked cash flow for 33 leading fracking companies. It found that fracking-focused companies continued to lose cash through the first half of 2018. Specifically, between January and June 2018, in spite

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<sup>1355</sup> Olson, B., Elliott, R., & Matthews, C. M. (2019, January 2). Fracking’s secret problem—oil wells aren’t producing as much as forecast. *Wall Street Journal*. Retrieved from <https://www.wsj.com/articles/frackings-secret-problemoil-wells-arent-producing-as-much-as-forecast-11546450162>

of rising oil prices, fracking companies spent \$3.9 billion more on drilling than they generated by selling oil and gas.<sup>1356</sup>

- September 20, 2018 – Confronted with falling prices and mounting debt, Southwest Energy sold off its assets in Arkansas’ Fayetteville Shale, placing fracking on hold.<sup>1357</sup>
- June 4, 2018 – A macroeconomic study using a simulation model found that economies that depend on fossil fuel extraction could be gravely harmed if global demand for fossil fuels declines in the face of innovations in energy efficiency and renewable technologies and public policy that promotes them. “Russia, the United States or Canada... could see their fossil fuel industries nearly shut down. ... The United States is worse off if it continues to promote fossil fuel production and consumption than if it moves away from them. This is due to the way global fossil fuel prices are formed. If the rest of the world reduces fossil fuel consumption and there is a sell-out, then lower fuel prices will make much US production non-viable, regardless of its own policy, meaning that its assets become stranded.”<sup>1358</sup>
- June 16, 2017 – Because of a persistent slump in gas prices and the declining productivity of many of its Marcellus Shale wells, the revenue from gas drilling fees fell for a third straight year in Pennsylvania. The annual fee revenue goes to county and municipal governments, roadway repairs, and infrastructure upgrades, among other things.<sup>1359</sup>
- April 3, 2017 – A British team of researchers assessed the physical footprint of well pads in Europe and the United Kingdom if shale gas development goes forward. When they included proposed setbacks for the UK—the minimal distance well pads have to be away from existing homes and other infrastructure—they found that recoverable oil and gas would be limited by 74 percent.<sup>1360</sup>
- March 25, 2017 – The *Economist* took shale fracking to task for its unstable finances and inability to turn a profit. “Shale firms are on an unparalleled money-losing streak. About \$11bn was torched in the last quarter, as capital expenditures exceeded cashflows. The

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<sup>1356</sup> Institute for Energy Economics and Financial Analysis, & Sightline Institute. (2018, October 17). *Energy market update: Red flags on U.S. fracking, disappointing financial performance continues*. Retrieved from [http://ieefa.org/wp-content/uploads/2018/10/Red-Flags-on-U.S.-Fracking\\_October-2018.pdf](http://ieefa.org/wp-content/uploads/2018/10/Red-Flags-on-U.S.-Fracking_October-2018.pdf)

<sup>1357</sup> Breen, D. (2018, September 20). Fayetteville Shale assets sold off, fracking still on hold. *Arkansas Public Media*. Retrieved from <https://www.arkansaspublicmedia.org/post/fayetteville-shale-assets-sold-fracking-still-hold>

<sup>1358</sup> Mercure, J.-F., Pollitt, H., Viñuales, J. E., Edwards, N. R., Holden, P. B., Chewpreecha, U., . . . Knobloch, F. (2018). Macroeconomic impact of stranded fossil fuel assets. *Nature Climate Change*, 8, 588-593. doi: 10.1038/s41558-018-0182-1

<sup>1359</sup> Carlson, C. (2017, June 16). Pennsylvania gas drilling fee revenue falls for third year. *WENY.com*. Retrieved from [http://www.weny.com/story/35680098/pennsylvania-gas-drilling-fee-revenue-falls-for-third-year?utm\\_medium=social&utm\\_source=twitter\\_WENYTV](http://www.weny.com/story/35680098/pennsylvania-gas-drilling-fee-revenue-falls-for-third-year?utm_medium=social&utm_source=twitter_WENYTV)

<sup>1360</sup> Clancy, S. A., Worrall, F., Davies, R. J. & Gluyas, J. G. (2018). An assessment of the footprint and carrying capacity of oil and gas well sites: The implications for limiting hydrocarbon reserves. *Science of the Total Environment*, 618, 586-594. Advance online publication. doi: 10.1016/j.scitotenv.2017.02.160

cash-burn rate may well rise again this year. . . . The oil bulls of Houston have yet to prove that they can pump oil and create value at the same time.”<sup>1361</sup>

- March 21, 2017 – An MIT study questioned the U.S. Energy Information Administration’s rosy projections on the abundance and availability of shale gas and oil. Analyzing field data on oil wells in North Dakota’s Williston Basin, the authors found that advances in fracking technology, such as the shift to longer laterals per well, have had a more modest impact on boosting oil and gas production than the agency had estimated. At the same time, the attraction of operators to the most productive areas of basins has had a greater impact. As time goes by, the prime drilling spots with the easy-to-extract oil or gas will get used up, the authors argued, and technology may not be able to compensate.<sup>1362, 1363</sup>
- July 7, 2016 – “Oil-field-services companies are depleted after slashing prices and laying off workers, and their slow recovery could crimp the energy industry’s overall ability to bounce back from the oil bust,” according to the *Wall Street Journal*. Almost 70 percent of fracking equipment in the United States has been idled, and 60 percent of field workers involved in fracking have been laid off. Halliburton alone has laid off over 28,500 workers, which is one third of its workforce. More than 70 oilfield services companies have filed for bankruptcy since the beginning of 2015.<sup>1364</sup>
- June 15, 2016 – Billions of dollars of proven reserves have become unproven this year, as “59 U.S. oil and gas companies deleted the equivalent of 9.2 billion barrels, more than 20 percent of their inventories,” according to *Bloomberg*. In 2009, the Securities and Exchange Commission (SEC) made it easier for the companies to include in their proven reserves undeveloped acreage and wells that wouldn’t be drilled for years on the grounds that “shale prospects are predictable across wide expanses.” Since then, the SEC has become more strict about inflated reserves estimates.<sup>1365</sup>
- May 16, 2016 – *CNN Money* reported on the two latest U.S. oil and gas bankruptcies: SandRidge Energy’s Chapter 11 filing was based on roughly \$4 billion of debt and came the week after the biggest such bankruptcy to date—that of Linn Energy with more than \$10 billion in debt. There had been at least 29 U.S. oil and gas bankruptcies in 2016 at the date of the article’s publication, bringing the 2015-2016 total to at least 64. “The industry has historically been full of wildcatters and speculators. It’s not surprising we’re

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<sup>1361</sup> America’s shale firms don’t give a frack about financial returns. (2017, March 25). *Economist*. Retrieved from <https://www.economist.com/news/business-and-finance/21719436-exploration-and-production-companies-are-poised-go-another-investment-spree-americas>

<sup>1362</sup> Montgomery, J. B., & O’Sullivan, F. M. (2017). Spatial variability of tight oil well productivity and the impact of technology. *Applied Energy*, 195, 344–355. doi: 10.1016/j.apenergy.2017.03.038

<sup>1363</sup> Marshall, C. (2017, October 6). Studies attack conventional wisdom on natural gas. *E&E News*. Retrieved from <https://www.eenews.net/stories/1060062933>

<sup>1364</sup> Sider, A. (2016, July 7). Revving up oil fields won’t be so easily done. *Wall Street Journal*. Retrieved from <http://www.wsj.com/articles/revving-up-oil-fields-wont-be-so-easily-done-1467883807>

<sup>1365</sup> Loder, A. (2016, June 15). Why billions in proven shale oil reserves suddenly became unproven. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/articles/2016-06-15/shale-drillers-paper-wells-draw-sec-scrutiny-before-vanishing>

going through this boom-and-bust cycle,” the article quoted the managing director at oil restructuring firm SOLIC Capital, George Koutsonicolis, as saying.<sup>1366</sup>

- May 9, 2016 – “The pace of oil patch bankruptcies is picking up,” a *Forbes* piece read, listing the 15 biggest such bankruptcies to date. “All told, 69 oil and gas producers with \$34.3 billion in cumulative secured and unsecured debt have gone under.”<sup>1367</sup>
- March 25, 2016 – Oil and gas borrowers “feasted on what Bloomberg estimates was \$237 billion of easy money without scrutinizing whether the loans could endure a drastic downturn,” according to a *Washington Post* piece focusing on one company, Swift Energy, which itself was \$1.349 billion in debt and had entered bankruptcy. Despite having been cautious prior to the Texas fracking boom, “[a]s the company began to frack more often, the amount it spent on exploration and drilling skyrocketed by hundreds of millions of dollars.” Those expenses combined with global developments led to its failure, along with over 40 other oil and gas companies in 2015. “The consequences are far-reaching. The U.S. oil industry, having grown into a giant on par with Saudi Arabia’s, is shrinking, with the biggest collapse in investment in energy in 25 years. More than 140,000 have lost energy jobs. Banks are bracing for tens of billions of dollars of defaults, and economists and lawyers predict the financial wreckage will accelerate this year.”<sup>1368</sup>
- March 10, 2016 – Crude oil production is not falling as quickly as predicted, given the sharp decline in prices and the drop-off in new drilling and fracking operations. As reported by Reuters, this disconnect is due to refracking of older wells, along with other unconventional techniques such as “choking” and “lifting,” which can extend the productive lives of wells or otherwise capture more product from them.<sup>1369</sup>
- March 1, 2016 – An analysis of fracking trends in the journal *Nature* concluded that a European shale gas boom was unlikely due to disappointing early yields (Poland, Lithuania and Denmark), links to earthquakes (United Kingdom), and intense public opposition in densely populated areas throughout the continent.<sup>1370</sup>
- June 19, 2015 – A *Bloomberg Business* analysis of the 62 drilling companies in the Bloomberg Intelligence North America Independent Exploration and Production Index found that the companies’ debt continued to be a major problem. For 27 of the 62 companies, interest payments were consuming more than 10 percent of revenue. Drillers’ debt rose to \$235 billion at the end of the first quarter, a 16 percent increase over the year

<sup>1366</sup> Egan, M. (2016, May 16). Oil bankruptcies mount despite crude rebound. *CNN Money*. Retrieved from <http://money.cnn.com/2016/05/16/investing/sandridge-energy-oil-bankruptcy/>

<sup>1367</sup> Helman, C. (2016, May 9). The 15 biggest oil bankruptcies (so far). *Forbes*. Retrieved from <http://www.forbes.com/sites/christopherhelman/2016/05/09/the-15-biggest-oil-bankruptcies-so-far/#7c765e10739b>

<sup>1368</sup> Harlan, C. (2016, March 25). The big bust in the oil fields. *The Washington Post*. Retrieved from <https://www.washingtonpost.com/news/wonk/wp/2016/03/25/the-big-bust-in-the-oil-fields/>

<sup>1369</sup> Gopinath, S., & Gayathri, A. (2016, March 10). Forget fracking. Choking and lifting are latest efforts to stem U.S. shale bust. *Reuters*. Retrieved from <http://www.reuters.com/article/us-usa-shale-analysis-idUSKCN0WB1AI>

<sup>1370</sup> Inman, M. (2016). Can fracking power Europe? *Nature*, 531, 22-24. Retrieved from <http://www.nature.com/news/can-fracking-power-europe-1.19464>

prior. *Bloomberg Business* expressed concern that shale drillers have “consistently spent money faster than they’ve made it, even when oil was \$100 a barrel.” S&P assigned speculative, or junk, ratings to 45 of the 62 companies in Bloomberg’s index.<sup>1371</sup>

- April 7, 2015 – A Moody’s Investors Service analysis of liquefied natural gas (LNG) prospects found that lower oil prices were causing suppliers to defer or cancel most proposed LNG projects. Moody’s found that this was due in part to the drop in international oil prices relative to U.S. natural gas prices, thus removing the economic advantage of U.S. LNG projects. Moody’s stated, “LNG is a capital-intensive infrastructure business prone to periodic construction cycles that lead to overcapacity, which we expect will continue for the rest of the decade.”<sup>1372</sup>
- March 20, 2015 – A study by the Energy Watch Group in Germany found that the costs of allowing fracking in Germany would outweigh the benefits, noting in part that natural gas trading in the United States has been declining since 2009. The study also noted the costs of infrastructure, environmental and health risks and pointed to the need to expand renewable energy.<sup>1373</sup>
- December 19, 2014 – An International Energy Agency (IEA) report projected that U.S. domestic oil supplies, dominated by fracking, face challenges, and oil output from shale formations output, will level off and decline in the early 2020s.<sup>1374</sup> IEA Chief Economist Fatih Birol said, “A well-supplied oil market in the short-term should not disguise the challenges that lie ahead.”<sup>1375</sup>
- August 29, 2014 – Andrew Nikiforuk, a Canadian energy analyst, reported on diminishing returns and the higher-cost, higher-risk nature of fossil fuel extraction by fracking. Nikiforuk wrote, “Most of the world’s oil and gas firms are now pursuing extreme hydrocarbons because the cheap and easy stuff is gone.... That means industry will spend more good money chasing poor quality resources. They will inefficiently mine and frack ever larger land bases at higher environmental costs for lower energy returns.”<sup>1376</sup>

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<sup>1371</sup> Loder, A. (2015, June 18). The shale industry could be swallowed by its own debt. *Bloomberg Business*. Retrieved from <http://www.bloomberg.com/news/articles/2015-06-18/next-threat-to-u-s-shale-rising-interest-payments>

<sup>1372</sup> Moody’s Investors Service. (2015, April 7). Lower oil prices cause suppliers of liquefied natural gas to nix projects. Retrieved from [https://www.moody’s.com/research/Moodys-Liquefied-natural-gas-projects-nixed-amid-lower-oil-prices--PR\\_322439](https://www.moody’s.com/research/Moodys-Liquefied-natural-gas-projects-nixed-amid-lower-oil-prices--PR_322439)

<sup>1373</sup> Sagner, N. (2015, March 26). Fracking costs outweigh benefits for Germany and Europe, study says. *EurActiv*. Retrieved from <http://www.euractiv.com/sections/energy/fracking-costs-outweigh-benefits-germany-and-europe-study-says-313087>

<sup>1374</sup> International Energy Agency. (2014, December). World Energy Outlook 2014 Executive Summary. Retrieved from [http://www.iea.org/publications/freepublications/publication/WEQ\\_2014\\_ES\\_English\\_WEB.pdf](http://www.iea.org/publications/freepublications/publication/WEQ_2014_ES_English_WEB.pdf)

<sup>1375</sup> Dimick, D. (2014, December 19). How long can the U.S. oil boom last? *National Geographic*. Retrieved from <http://news.nationalgeographic.com/news/2014/12/141219-fracking-oil-supply-price-reserves-profits-environment/>

<sup>1376</sup> Nikiforuk, A. (2014, August 29). A big summer story you missed: Soaring oil debt returns diminish as energy companies resort to higher-cost, higher-risk hydrocarbons. *The Tyee*. Retrieved from <http://thetyee.ca/Opinion/2014/08/29/Soaring-Oil-Debt-Summer/>

- July 29, 2014 – According to the U.S. Energy Information Administration, energy companies are incurring increasing debt and selling assets to continue drilling in shale. “Based on data compiled from quarterly reports, for the year ending March 31, 2014, cash from operations for 127 major oil and natural gas companies totaled \$568 billion, and major uses of cash totaled \$677 billion, a difference of almost \$110 billion. This shortfall was filled through a \$106 billion net increase in debt and \$73 billion from sales of assets . . .”<sup>1377</sup>
- July 2014 – Researchers at the Washington, DC-based Environmental Law Institute and Washington & Jefferson College in Pennsylvania collaborated to produce a report designed in part to help communities avoid the “boom and bust” cycles of extractive industries. Authors warned, “While resource extraction has long been regarded as an economic benefit, a body of academic literature suggests that long term growth based chiefly on resource extraction is rare.” Confounding factors include transience of the workforce, localized inflation, widening disparities in royalties and impact fee disbursement, commodity price volatility, and communities overspending on infrastructure.<sup>1378</sup>
- June 19, 2014 – Energy analyst Deborah Lawrence Rogers outlined the spiraling debt and severe deterioration of the assets of five major shale gas drillers over the last five years. She concluded, “This is not sustainable. It could be argued that it is not even moral. It is a failed business model of epic proportion. While companies could make the argument at one time that this was a short term downtrend, that no longer holds water because this pattern is long term.”<sup>1379</sup>
- April 10, 2014 – A report by a petroleum geologist and petroleum engineer concluded the 100-year supply of shale gas is a myth, distinguished between what is technically recoverable and economically recoverable shale gas, and asserted that at current prices, New York State has no economically recoverable shale gas.<sup>1380</sup>
- February 28, 2014 – Maria van der Hoeven, Executive Director of the IEA, said in an interview with *The Christian Science Monitor* that there is only a decade left in the U.S. shale oil and gas boom, noting that her agency’s analysis predicts that production will soon flatten out and, by 2025, begin to decline.<sup>1381</sup>

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<sup>1377</sup> US Energy Information Administration. (2014, July 29). As cash flows flatten, major energy companies increase debt, sell assets. *Today in Energy*. Retrieved from <http://www.eia.gov/todayinenergy/detail.cfm?id=17311>

<sup>1378</sup> Environmental Law Institute, & Washington & Jefferson College. (2014, July). Getting the boom without the bust: Guiding Southwestern Pennsylvania through shale gas development. Retrieved from <http://www.eli.org/sites/default/files/eli-pubs/getting-boom-final-paper-exec-summary-2014-07-28.pdf>

<sup>1379</sup> Rogers, D. L. (2014, June 19). Huge CAPEX = free cash flow? Not in shales. *Energy Policy Forum*. Retrieved from <http://energypolicyforum.org/2013/06/19/huge-capex-free-cash-flow-not-in-shales/>

<sup>1380</sup> Labyrinth Consulting Services, Inc., Berman, A., & Pittinger, L. (2014). Resource Assessment of Potentially Producing Natural Gas Volumes From the Marcellus Shale, State of New York. Retrieved from: <http://www.lwny.org/>

<sup>1381</sup> Unger, D. J. (2014, February 28). IEA chief: Only a decade left in US shale oil boom. *Christian Science Monitor*. Retrieved from <http://www.csmonitor.com/Environment/Energy-Voices/2014/0228/IEA-chief-Only-a-decade-left-in-US-shale-oil-boom>



- December 18, 2013 – A University of Texas study in *Proceedings of the National Academy of Sciences* found that fracking well production drops sharply with time, which undercuts the oil and gas industry’s economic projections.<sup>1382</sup> In an interview about the study with *StateImpact NPR* in Texas, Tad Patzek, Chair of the Department of Petroleum and Geosystems Engineering at University of Texas at Austin, noted that fracking “also interferes now more and more with daily lives of people. Drilling is coming to your neighborhood, and most people abhor the thought of having somebody drilling a well in their neighborhood.”<sup>1383</sup>
- August 18, 2013 – *Bloomberg News* reported that low gas prices and disappointing wells have led major companies to devalue oil and gas shale assets by billions of dollars.<sup>1384</sup>
- October 21, 2012 – The *New York Times* reported that many gas drilling companies overproduced natural gas backed by creative financing and now “are committed to spending far more to produce gas than they can earn selling it.” “We are all losing our shirts today,” said Exxon CEO Rex Tillerson in the summer of 2012.<sup>1385</sup>
- July 13, 2012 – *The Wall Street Journal* reported that ITG Investment Research, at the request of institutional investors, evaluated the reserves of Chesapeake Energy Corporation’s shale gas reserves in the Barnett and Haynesville formations and found them to be only 70 percent of estimates by Chesapeake’s engineering consultant for the company’s 2011 annual report. Chesapeake and its consultant defended their figures.<sup>1386</sup>
- August 23, 2011 – The U.S. Geological Survey (USGS) cut the government’s estimates of natural gas in the Marcellus Shale from 410 trillion cubic feet to 84 trillion cubic feet, equivalent to a reduction from approximately 16 years of U.S. consumption at current levels of natural gas use, to approximately 3.3 years of consumption. The USGS’s updated estimate was for natural gas that is technically recoverable, irrespective of economic considerations such as the price of natural gas or the cost of extracting it.<sup>1387</sup>

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<sup>1382</sup> Patzek, T. W., Male, F., & Marder, M. (2013). Gas production in the Barnett Shale obeys a simple scaling theory. *Proceedings of the National Academy of Sciences*, 110(49), 19731-19736. doi: 10.1073/pnas.1313380110

<sup>1383</sup> Buchele, M. (2013, December 18). New study shows how gas production from “fracked” wells slows over time. *StateImpact*. Retrieved from <http://stateimpact.npr.org/texas/2013/12/18/new-study-shows-how-gas-production-from-fracked-wells-slows-over-time/>

<sup>1384</sup> Monks, M., Penty, R., & De Vynck, G. (2013, August 18). Shale grab in U.S. stalls as falling values repel buyers. *Bloomberg*. Retrieved from <http://www.bloomberg.com/news/2013-08-18/shale-grab-in-u-s-stalls-as-falling-values-repel-buyers.html>

<sup>1385</sup> Krauss, C., & Lipton, E. (2012, October 20). After the boom in natural gas. *The New York Times*. Retrieved from <http://www.nytimes.com/2012/10/21/business/energy-environment/in-a-natural-gas-glut-big-winners-and-losers.html?pagewanted=all>

<sup>1386</sup> Wirz, M. (2013, July 13). Chesapeake reserve doubted. *Wall Street Journal*. Retrieved from <http://online.wsj.com/news/articles/SB10001424052702303644004577523411723501548>

<sup>1387</sup> United States Geological Survey. (2011, August 23). USGS releases new assessment of gas resources in the Marcellus shale, Appalachian Basin. *USGS Newsroom*. Retrieved from [http://www.usgs.gov/newsroom/article.asp?ID=2893&from=rss\\_home#.Uok0mGRO\\_GA](http://www.usgs.gov/newsroom/article.asp?ID=2893&from=rss_home#.Uok0mGRO_GA).

- June 26-27, 2011 – As reported in two *New York Times* stories, hundreds of emails, internal documents, and analyses of data from thousands of wells from drilling industry employees, combined with documents from federal energy officials, raised concerns that shale gas companies were overstating the amount of gas in their reserves and the profitability of their operations.<sup>1388, 1389, 1390</sup> The *New York Times*' public editor criticized the stories, but offered no evidence that the major findings were wrong.<sup>1391</sup> The *New York Times*' news editors publicly defended both stories against the public editor's criticism.<sup>1392, 1393</sup>

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<sup>1388</sup> Urbina, I. (2011, June 25). Insiders sound an alarm amid a natural gas rush. *The New York Times*. Retrieved from <http://www.nytimes.com/2011/06/26/us/26gas.html?pagewanted=all>

<sup>1389</sup> U.S. Energy Information Administration. (2014, May 30). *U.S. Natural Gas Summary*. Retrieved from [http://www.eia.gov/dnav/ng/ng\\_sum\\_lsum\\_dcu\\_nus\\_a.htm](http://www.eia.gov/dnav/ng/ng_sum_lsum_dcu_nus_a.htm)

<sup>1390</sup> Urbina, I. (2011, August 24). Geologists sharply cut estimate of shale gas. *The New York Times*. Retrieved from <http://www.nytimes.com/2011/08/25/us/25gas.html>

<sup>1391</sup> Brisbane, A. S. (2011, July 16). Clashing views on the future of natural gas. *The New York Times*. Retrieved from <http://www.nytimes.com/2011/07/17/opinion/sunday/17pubed.html?gwh=7D408242717755A0E06B0D265498E177&gwt=pay&assetType=opinion&r=0>

<sup>1392</sup> Brisbane, A. S. (2011, July 17). Times editors respond to my shale gas column. *The New York Times*. Retrieved from <http://publiceditor.blogs.nytimes.com/2011/07/17/times-editors-respond-to-my-shale-gas-column/>

<sup>1393</sup> Brisbane, A. S. (2011, July 30). Times editors respond to column on redactions. *The New York Times*. Retrieved from <http://publiceditor.blogs.nytimes.com/2011/07/30/times-editors-respond-to-column-on-redactions/>

## Disclosure of serious risks to investors

*A snapshot of the dangers posed by natural gas drilling and fracking can be found in the annual Forms 10-K that oil and natural gas companies are required to file with the U.S. Securities and Exchange Commission (SEC). The information so contained in these reports, which provide a comprehensive summary of a company's financial performance, provides a window into the harms and risks of fracking that are otherwise shielded from view by "gag order" clauses in court settlements, non-disclosure agreements between industry and landowners, and trade secret claims in regards to the chemical ingredients of fracking fluid. In this way, the Form 10-K can serve as an imperfect surrogate for right-to-know data. Recently, Forms 10-K have been used to warn investors about risks from climate change lawsuits.*

Federal law requires that companies offering stock to the public disclose in their Form 10-K, among other things, the "most significant factors that make the offering speculative or risky."<sup>1394</sup> In a review of Forms 10-K spanning the past decade available on the SEC's website, oil and natural gas companies have routinely warned of drilling's serious risks. In the words of Exxon Mobil Corporation's subsidiary XTO Energy, "our operations are subject to hazards and risks inherent in drilling."<sup>1395</sup> In the language of Range Resources Corporation: "development and exploratory drilling and production activities are subject to many risks."<sup>1396</sup>

Such hazards and risks include leaks, spills, explosions, blowouts, environmental damage, property damage, injury, and death. Chesapeake Energy Corporation has stated that "horizontal and deep drilling activities involve greater risk of mechanical problems than vertical and shallow drilling operations."<sup>1397</sup> Over the past 15 years, companies have combined horizontal drilling with hydraulic fracturing to tap natural gas and oil in shale formations.

The companies also routinely warn of inadequate insurance to cover drilling harms. According to XTO Energy, "we are not fully insured against all environmental risks, and no coverage is maintained with respect to any penalty or fine required to be paid by us."<sup>1398</sup> Range Resources states, "we can provide no assurance that our coverage will

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<sup>1394</sup> See 17 C.F.R. § 229.503(c) (companies must disclose the "most significant" risks); 17 C.F.R. § 230.405 ("the term material, when used to qualify a requirement for the furnishing of information as to any subject, limits the information required to those matters to which there is a substantial likelihood that a reasonable investor would attach importance in determining whether to purchase the security registered"); 17 C.F.R. § 240.10b-5 (it is illegal "to make any untrue statement of a material fact or to omit to state a material fact . . . in connection with the purchase or sale of any security"); 17 C.F.R. 249.310 (requiring Form 10-K, "for annual and transition reports pursuant to sections 13 or 15(d) of the Securities Exchange Act of 1934.")

<sup>1395</sup> XTO Energy Corp., Annual Report (Form 10-K) (Feb. 25, 2010) at 25.

<sup>1396</sup> Range Resources Corp., Annual Report (Form 10-K) (Feb. 24, 2015) at 22.

<sup>1397</sup> Chesapeake Energy Corp., Annual Report (Form 10-K) (Feb. 27, 2015) at 18.

<sup>1398</sup> XTO Energy Corp., Annual Report (Form 10-K) (Feb. 25, 2010) at 17.

adequately protect us against liability from all potential consequences, damages and losses.”<sup>1399</sup>

Houston-based Noble Energy provides a representative example of the risks that at least several drilling companies include in their annual reports. Noble states:

Our operations are subject to hazards and risks inherent in the drilling, production and transportation of crude oil, natural gas and NGLs [natural gas liquids], including:

- injuries and/or deaths of employees, supplier personnel, or other individuals;
- pipeline ruptures and spills;
- fires, explosions, blowouts and well cratering;
- equipment malfunctions and/or mechanical failure on high-volume, high-impact wells;
- leaks or spills occurring during the transfer of hydrocarbons from an FPSO [floating production storage and offloading vessels] to an oil tanker;
- loss of product occurring as a result of transfer to a rail car or train derailments;
- formations with abnormal pressures and basin subsidence which could result in leakage or loss of access to hydrocarbons;
- release of pollutants;
- surface spillage of, or contamination of groundwater by, fluids used in operations;
- security breaches, cyber attacks, piracy, or terroristic acts;
- theft or vandalism of oilfield equipment and supplies, especially in areas of active onshore operations;
- hurricanes, cyclones, windstorms, or “superstorms,” which could affect our operations in areas such as the Gulf Coast, deepwater Gulf of Mexico, Marcellus Shale or Eastern Mediterranean;
- winter storms and snow which could affect our operations in the DJ Basin [Denver-Julesburg Basin in Colorado] or Marcellus Shale;
- extremely high temperatures, which could affect third party gathering and processing facilities in the DJ Basin;
- volcanoes which could affect our operations offshore Equatorial Guinea;
- flooding which could affect our operations in low-lying areas;
- harsh weather and rough seas offshore the Falkland Islands, which could limit certain exploration activities; and
- pandemics and epidemics, such as the Ebola virus, which is ongoing in certain regions of West Africa and may adversely affect our business operations through travel or other restrictions.

Any of these can result in loss of hydrocarbons, environmental pollution and other damage to our properties or the properties of others.<sup>1400</sup>

Noble has language similar to that found in other companies’ annual reports about inadequate insurance and adds, “we do not have insurance for gradual pollution nor do

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<sup>1399</sup> Range Resources Corp., Annual Report (Form 10-K) (Feb. 24, 2015) at 26.

<sup>1400</sup> Noble Energy, Annual Report (Form 10-K) (Feb. 19, 2015) at 38.

we have coverage for penalties or fines that may be assessed by a governmental authority.”<sup>1401</sup>

Forms 10-K are also a tool of disclosure for risks concerning climate change beyond specific negative impacts on operations (hurricanes, flooding, etc.) listed, for example, in Noble Energy’s annual report cited above. In 2016, Chevron became the first major oil company to warn investors in its Form 10-K about the risk of climate change lawsuits: “Increasing attention to climate change risks has resulted in an increased possibility of governmental investigations and, potentially, private litigation against the company.”<sup>1402</sup> Also in 2016, the SEC began investigating Exxon Mobil for valuing its assets in ways that do not account for the possible depreciation of oil and gas under a policy framework that shifts investments in energy away from fossil fuels and toward renewable sources.<sup>1403</sup> Under pressure from investors, Exxon agreed in December 2017 to disclose more details about climate risks by filing with the SEC, in a Form 8-K, a statement that said the company would no longer resist motions from shareholders seeking this information.<sup>1404</sup>

At this writing, it is not clear whether, under the current Administration, the SEC will continue its push toward investor disclosure of climate change risks.<sup>1405</sup> Nevertheless, the unsolved problem of methane leaks is increasingly recognized as a rising risk for oil and gas investors concerned that methane emissions are not transparently managed, may negate the claim that natural gas is more climate-friendly than coal, and hence pose a risk to their investments.<sup>1406, 1407</sup>

The risks identified by these oil and gas companies are not just hypothetical. Many, if not all of these risks are reflected in the evidence compiled in other sections of this Compendium.

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<sup>1401</sup> Noble Energy. Annual Report (Form 10-K) (Feb 19, 2015) at 79.

<sup>1402</sup> Romm, J. (2017, March 2). Chevron is first oil major to warn investors of risks from climate change lawsuits. *ThinkProgress*. Retrieved from <https://thinkprogress.org/chevron-admits-climate-lawsuits-threaten-profits-33937dd562fd/#.56j1qq4h3>

<sup>1403</sup> Olson, B., & Viswanatha, A. (2016, September 20). SEC probes Exxon over accounting for climate change. *Wall Street Journal*. Retrieved from <https://www.wsj.com/articles/sec-investigating-exxon-on-valuing-of-assets-accounting-practices-1474393593>

<sup>1404</sup> Cushman, Jr., J. H., & Hasemyer, D. (2017, December 12). Exxon agrees to disclosure climate risks under pressure from investors. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/12122017/exxon-climate-risk-disclosure-sec-shareholder-investigation-pressure>

<sup>1405</sup> Griffen, P., & Jaffe, A. M. (2017, February 15). Are fossil fuel companies telling investors enough about the risks of climate change? *The Conversation*. Retrieved from <https://theconversation.com/are-fossil-fuel-companies-telling-investors-enough-about-the-risks-of-climate-change-72562>

<sup>1406</sup> Connan, M.-S. (2016, December 1). *Methane: The next frontier for fossil fuel emissions*. Retrieved from <https://us.allianzgi.com/en-us/insights/capital-markets-and-economics/methane-the-next-frontier-for-fossil-fuel-emissions>

<sup>1407</sup> Gilblom, K. (2017, December 19). Insidious gas leaks are casting doubts over Shell's clean credentials. *Bloomberg*. Retrieved from <https://www.bloomberg.com/news/articles/2017-12-20/as-shell-gambles-on-gas-leaks-cast-cloud-over-clean-credentials>

## Medical and scientific calls for more study, reviews confirming evidence for harm, and calls for increased transparency and science-based policy

*With increasing urgency, groups of medical and other health professionals and scientists are issuing calls for comprehensive, long-term study of the full range of potential health and ecosystem effects of drilling and fracking. These appeals underscore the accumulating evidence of harm, point to the major knowledge gaps that remain, and decry the atmosphere of secrecy and intimidation that continues to impede the progress of scientific inquiry. Published reviews and international governmental reports underscore the mounting evidence of health risks including developmental, neurological, carcinogenic, respiratory, reproductive, and psychological. Health professionals and scientists in the United States and around the world increasingly call for the suspension of unconventional gas and oil extraction activities in order to limit, mitigate, or eliminate its serious, adverse public health hazards, including health threats from climate change.*

- March 29, 2019 – Doctors for the Environment Australia announced the reinforcement of its position that no new gas extraction of any kind should occur in Australia. Its position was largely informed by the wealth of literature from the United States documenting adverse health findings.<sup>1408</sup> The organization’s review found growing evidence of direct health impacts as well as a clear potential for indirect impacts of gas and oil mining on essential environmental determinants of health. “These concerns include risks to a stable climate, air quality, water quality, water security, food security, community cohesion and, in some locations, geological stability. The cumulative impacts of these industries on the wider requirements for good health and wellbeing are extremely concerning.”<sup>1409</sup>
- February 1, 2019 – Natural gas extraction via fracking is associated with “preterm birth, high-risk pregnancy, and possibly low birth weight; three types of asthma exacerbations; and nasal and sinus, migraine headache, fatigue, dermatologic, and other symptoms,” according to a review covering research through mid-2017.<sup>1410</sup> The Johns Hopkins Bloomberg School of Public Health scientists cited the methodological robustness of these studies and the biological plausibility of the links found. Further, they included in their review the contribution of fracking to climate change and its further health impacts. Authors expressed serious doubt that the risks of fracking can be managed. “Some have suggested that regulations will prevent health impacts, but no health studies provide guidance on what regulations, if any, will get the health effects to go away.” The authors further noted that the fracking boom has, in many regions, outpaced the ability of science

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<sup>1408</sup> Haswell, M., & Shearman, D. (2019, March 29). Expanding gas mining threatens our climate, water and health. *The Conversation*. Retrieved from <https://theconversation.com/expanding-gas-mining-threatens-our-climate-water-and-health-113047>

<sup>1409</sup> Haswell, M., & Shearman, D. (2019). The implications for human health and wellbeing of expanding gas mining in Australia: Onshore oil and gas policy background paper. College Park, South Australia: Doctors for the Environment Australia. Retrieved from <https://www.dea.org.au/wp-content/uploads/2018/12/DEA-Oil-and-Gas-final-28-11-18.pdf>

<sup>1410</sup> Gorski, I., & Schwartz, B. S. (2019). Environmental health concerns from unconventional natural gas development. *Oxford Research Encyclopedia of Global Public Health*. doi: 10.1093/acrefore/9780190632366.013.44

to document health impacts with long latencies, such as cancer and neurodegenerative diseases. The review concluded that the results of early health studies “should give pause” about whether and how shale gas fracking should proceed and referenced the several U.S. states and nations that have disallowed fracking, citing health concerns.

- December 12, 2018 – “The healthcare community has a professional mandate to protect society from harm to human health. We have a responsibility to help society move away from fossil fuels and accelerate the transition to renewable energy,” wrote a team of medical professionals in an editorial for the *British Medical Journal*. Citing the “overwhelming” evidence that fossil fuels pose serious threats to public and planetary health, the group identified divestment from fossil fuel corporations as a strategy that increasing numbers of medical professional groups are taking, as part of fulfilling that professional mandate.<sup>1411</sup>
- December 4, 2018 – In a review of 63 studies in 20 countries, a University of Southern California medical research team concluded that the potential public health effects of “upstream oil extraction” include cancer, liver damage, immunodeficiency, and neurological damage. Collectively, onshore operations that bring crude oil to the surface affect nearly six million people that live or work nearby. Community health, worker health, and animal health in oil-drilling regions were addressed in this review, as well as effects on soil, air, surface water, and drinking water quality. In their analysis, the authors included both conventional or unconventional extraction techniques but noted that, in the United States, hydraulic fracturing accounted for 50 percent of total oil production in 2015—up from less than two percent in 2000.<sup>1412</sup>
- August 16, 2018 – The closer one lives to fracking sites, the more likely one is to experience toxic exposures and a related number of health impacts. Setbacks less than one quarter mile (1,320 feet) from drilling and fracking operations are not sufficient to protect public health, and additional setbacks are needed to protect vulnerable groups and settings, according to an expert panel assembled in Pennsylvania. “Vulnerable groups were defined by the panelists as children, neonates, fetuses, embryos, pregnant women, elderly individuals, those with pre-existing medical or psychological conditions, and those with pre-existing respiratory conditions. Vulnerable settings were defined as schools, day care centers, hospitals, and long-term care facilities. The panel, which consisted of 18 health care providers, public health practitioners, environmental advocates, and researchers/scientists, was brought together to compare existing minimum setback requirements against research about the health impacts of living near fracking activity. The panel was unable to come to agreement on a minimum safe setback distance between one quarter and two miles. It also noted that the failure to achieve consensus on this issue reflects uncertainties based on limited data of real-time toxic emissions from

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<sup>1411</sup> Law, A., Duff, D., Saunders, P., Middleton, J., & McCoy, D. (2018). Medical organisations must divest from fossil fuels. *British Medical Journal*, 363, k5163. doi: 10.1136/bmj.k5163

<sup>1412</sup> Johnston, J. E., Lim, E., & Roh, H. (2018). Impact of upstream oil extraction and environmental public health: A review of the evidence. *Science of the Total Environment*, 657, 187-199. doi: 10.1016/j.scitotenv.2018.11.483

drilling and fracking operations, the limited number of scientific studies available, and the potential for episodically recurrent periods of high exposures.<sup>1413</sup>

- June 5, 2018 – The exacerbation of climate change caused by shale gas development is sufficient grounds to confirm that “the risks clearly and considerably outweigh any possible benefits,” according to two public health scholars who published their editorial in the *British Medical Journal*.<sup>1414</sup>
- May 9, 2018 – With the objective of making practical recommendations for primary care providers, researchers sought to identify all published peer-reviewed studies examining evidence of direct relationships between high-volume hydraulic fracturing and human health harms. As a scoping review, the study purpose was to examine the extent and breadth of research and identify research gaps. Their criteria for inclusion were “narrow” and included peer-reviewed journal articles from the United States, in English, published between 2000 and September 2017. Among the 18 studies selected, 10 showed a positive correlation to the negative health outcome, six showed a mixed relationship, and two found no relationship. The authors wrote, “The health impacts found in the limited studies in this scoping review should encourage health care providers to maintain a high index of suspicion with patients who live or have lived near [drilling and fracking] activity or who have worked in oil and gas fields.”<sup>1415</sup>
- April 4, 2018 – Two scholars critiqued the wide-ranging consultation on unconventional gas extraction, including fracking, which was commissioned by the Scottish government and published in November 2016.<sup>1416</sup> Noting that the Scottish assessment is more comprehensive than assessments conducted in the United States and elsewhere, the authors wrote, “The public health impact assessment in particular is underpinned by what appears to be a rigorous and transparent examination of existing scientific literature drawing on external peer review at some stages.” However, they also went on to say that some of the conclusions drawn “appear to be optimistic readings of data and experience. For example, assessments of the ability of industry and regulators to control fracking effects on public health do not stand up to scrutiny.” They identified several other ways in which the health impact assessment’s conclusions were not always supported by the evidence it reviewed and if the assessment had overlooked areas of concern. For example, the literature on social impact assessments, as well as health research addressing questions of well-being and mental health, were neglected. Nevertheless, these scholars recommended the Scottish consultation as a research and policy tool.

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<sup>1413</sup> Lewis, C., Greiner, L. H., & Brown, D. R. (2018). Setback distances for unconventional oil and gas development: Delphi study results. *PlosOne*, 13(8), e0202462. doi: 10.1371/journal.pone.0202462

<sup>1414</sup> McCoy, D., & Saunders, P. (2018). Fracking and health. *British Medical Journal*, 361, k2397. doi: 10.1136/bmj.k2397

<sup>1415</sup> Wright, R., & Muma, R. D. (2018). High-volume hydraulic fracturing and human health outcomes: A scoping review. *Journal of Occupational and Environmental Medicine*, 5, 424–429. doi: 10.1097/JOM.0000000000001278

<sup>1416</sup> Watterson, A., & Dinan, W. (2018). Public health and unconventional oil and gas extraction including fracking: Global lessons from a Scottish government review. *International Journal of Environmental Research and Public Health*, 15(4), pii: E675. doi: 10.3390/ijerph15040675



- February 12, 2018 – The Los Angeles County Department of Public Health reviewed the public health and safety risks of oil and gas facilities and identified “next steps.” These included an increase in setback distances, continuous air monitoring systems around oil and gas operations, increased local oversight, a comprehensive Community Safety Plan, and Emergency Preparedness Plans. For this report, authors reviewed epidemiological literature, environmental and health impact assessments, neighborhood health investigations, and consultations with various jurisdictions regarding oil and gas ordinances.<sup>1417</sup> At the time of the report preparation, there were 3,468 active and 1,850 inactive oil and gas wells countywide. Conditions varied widely. Among the most egregious was an active well that was located 60 feet from a multi-unit housing complex and that shared borders with a local high school and a college dormitory. “The potential public health impacts of oil and gas sites located in densely populated areas are concerning, particularly to those who experience disproportionate economic and health inequities.” Recommendations for some individual neighborhoods included offering temporary relocation assistance. “The report was ordered by the city of Los Angeles after complaints of headaches, eye and throat irritation, nausea and vomiting were received from residents of South Los Angeles, Wilmington and unincorporated county areas in the past several years.”<sup>1418</sup>
- December 12, 2017 – Commissioned by the Australian government, the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory released its Draft Final Report. Tasked with identifying and assessing the risks of shale gas fracking for Australia’s remote Northern Territory—and with making recommendations to mitigate those risks where possible—the Inquiry describes a multiplicity of risks, including many that are ill-defined and understudied<sup>1419</sup> Most notably, it recommends a halt on all fracking production licenses until a two-to-three-year study can be launched to further understand the nature of the risks for the particular ecology and culture of the region.”<sup>1420</sup> Fracking is currently prohibited in the Northern Territory, which is estimated to hold over one-third of Australia’s shale gas.
- November 7, 2017 – In a commentary published in *JAMA*, two South Dakota physicians reviewed the data on the potential public health implications of fracking, including asthma, water contamination, exposures to fracking fluid, and exposure of workers to

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<sup>1417</sup> Butler, K., Tayour, C., Batikian, C., Contreras, C., Bane, M., Rhoades, E., . . . Rangan, C. (2018). Public health and safety risks of oil and gas facilities in Los Angeles County. Los Angeles County Department of Public Health. Retrieved from [http://publichealth.lacounty.gov/eh/docs/PH\\_OilGasFacilitiesPHSafetyRisks.pdf](http://publichealth.lacounty.gov/eh/docs/PH_OilGasFacilitiesPHSafetyRisks.pdf)

<sup>1418</sup> Scauzillo, S. (2018, February 27). Living near oil wells can cause health problems, LA County believes it has solutions. *Los Angeles Daily News*. Retrieved from <https://www.dailynews.com/2018/02/27/living-near-oil-wells-can-cause-health-problems-la-county-believes-it-has-solutions/>

<sup>1419</sup> Scientific Inquiry into Hydraulic Fracturing in the Northern Territory. (2017). *Draft final report of the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*. Retrieved from <https://frackinginquiry.nt.gov.au/inquiry-reports/draft-final-report>

<sup>1420</sup> Reuters staff. (2017, December 12). Study seen needed before lifting fracking ban in remote Australia. *Reuters*. Retrieve from <https://www.reuters.com/article/us-australia-fracking/study-seen-needed-before-lifting-fracking-ban-in-remote-australia-idUSKBN1E60TL>

silica dust. They voiced specific concerns about parkinsonism, neuropathy, and kidney disease, and called for prospective toxicity studies.<sup>1421</sup>

- October 25, 2017 – Scientists and physicians (including two co-authors of this *Compendium*) reviewed the body of evidence on the potential of unconventional oil and natural gas (UOG) development and operations to contribute to neurological and developmental harm via increased air and water pollution in the surrounding communities where it takes place. Highlighting data gaps and research limitations (such as the nondisclosure by industry of chemical mixtures), they nevertheless pinpointed evidence in the existing literature showing that “the chemicals that are used in or are byproducts of UOG operations have been linked to serious neurodevelopmental health problems in infants.”<sup>1422</sup> Interviewed by the *Guardian*, a co-author said, “Given the profound sensitivity of the developing brain and the central nervous system, it is very reasonable to conclude that young children who experience frequent exposure to these pollutants are at particularly high risk for chronic neurological problems and disease.”<sup>1423</sup> The research team concluded that there is “a need for public health prevention techniques, well-designed studies, and stronger state and national regulatory standards.”
- October 23, 2017 – A Yale University research team reported that carcinogens involved in fracking operations have the potential to contaminate both air and water in nearby communities in ways that may increase the risk of childhood leukemia. The team identified 55 known or possible carcinogens that may be released into air and water from fracking operations. Of these, 20 are linked to leukemia or lymphoma.<sup>1424</sup> “This analysis creates a priority list of carcinogens to target for future exposure and health studies.”<sup>1425</sup>
- July 31, 2017 – A review by a team of medical, psychological, occupational, and environmental health professionals concluded, “there appears to be an array of levels of psychosocial functioning that are deleteriously affected by the fracking process and industries and their aftermath.” Though much of the research they identified linking fracking to psychological functioning was preliminary, documented impacts included: individual-level impacts, such as feelings of stress and powerlessness; community-level impacts, such as disrupted social fabric and new gender/sex imbalances in the community; collective trauma such as caused by a boom-and-bust cycle; and worker impacts, such as psychosocial impacts of being a transient worker. The review provided

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<sup>1421</sup> Wilke, R. A., & Freeman, J. W. (2017). Potential health implications related to fracking. *JAMA*, 318(17), 1645-1646. doi: 10.1001/jama.2017.14239

<sup>1422</sup> Webb, E., Moon, J., Dyrszka, L., Rodriguez, B., Cox, C., Patisaul, H., ... London, E. (2017). Neurodevelopmental and neurological effects of chemicals associated with unconventional oil and natural gas operations and their potential effects on infants and children. *Reviews on Environmental Health*. Advance online publication. doi: 10.1515/reveh-2017-0008

<sup>1423</sup> Davis, N. (2017, October 25). Pollutants from fracking could pose health risk to children, warn researchers. *Guardian*. Retrieved from <https://www.theguardian.com/environment/2017/oct/25/pollutants-from-fracking-could-pose-health-risk-to-children-warn-researchers>

<sup>1424</sup> Elliot, E. G., Trihn, P., Ma, X., Leaderer, B. P., Ward, M. H., & Deziel, N. C. (2017). Unconventional oil and gas development and risk of childhood leukemia. *Science of the Total Environment*, 576. doi: 10.1016/j.scitotenv.2016.10.072

<sup>1425</sup> Yale News. (2016, October 24). Fracking linked to cancer-causing chemicals, new YSPH study finds. Retrieved from <https://publichealth.yale.edu/news/article.aspx?id=13714>

“an important first step in understanding the psychological toll that this energy development strategy has on fracking communities and sets the stage for advancements in research, clinical and policy, that will help us to better understand, assist, and advocate for those affected by fracking.”<sup>1426</sup>

- May 1, 2017 – The Southwest Pennsylvania Environmental Health Project established a voluntary public health registry “aimed at tracking and eventually analyzing the impacts of shale gas development on people living near wells, impoundments, compressor stations and pipelines.” According to a spokesperson, “The point is that the vast majority of independent science is looking at [shale gas development] and saying something’s not good there. We need to know more... The findings of this registry will allow the health care community to be more informed about what problems people are experiencing when they walk into their offices. It will give the doctors some idea of what they should be looking for.”<sup>1427</sup>
- April 28, 2017 – Portuguese and Brazilian reviewers identified the issue of water resources “as one of the most sensitive to negative impacts by shale gas exploration and exploitation,” in their examination of scientific articles published between 2010 and 2015. They pointed to “expected” new legislation and industry practices for impact reductions but continued on to say that there are “no indications of a solution in the near future” for the problems of wastewater and greenhouse gas emissions.<sup>1428</sup>
- February 8, 2017 – Addressing the community health and safety harms linked with camps that house temporary workers in extractive industries, the British Columbia Ministry of Aboriginal Relations and Reconciliation funded a research project carried out in consultation with Indigenous nations. The premise, that “Indigenous women and youth can experience negative impacts of resource extraction at every phase of resource development,” was borne out by the project’s community dialogues and literature review. “Increased domestic violence, sexual assault, substance abuse, and an increased incidence of sexually transmitted infections (STIs) and HIV/AIDS due to rape, prostitution, and sex trafficking are some of the recorded negative impacts of resource extraction projects, specifically as a result of the presence of industrial camps and transient work forces.” The objectives of the project were to stimulate dialogue and to develop detailed protective steps for Nations, government, and industry in advance of the initiation of planned extraction projects in the region, such as the TransCanada and Spectra Energy pipelines,

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<sup>1426</sup> Hirsch, J. K., Smalley, K. B., Selby-Nelson, E. M., Hamel-Lambert, J. M., Rosmann, M. R., Barnes, T. A., . . . LaFromboise, T. (2017). Psychosocial impact of fracking: A review of the literature on the mental health consequences of hydraulic fracturing. *International Journal of Mental Health and Addiction*. doi: 10.1007/s11469-017-9792-5

<sup>1427</sup> Hopey, D. (2017, May 1). Registry will study health impact from living near shale gas wells. *Pittsburgh Post-Gazette*. Retrieved from <http://powersource.post-gazette.com/powersource/consumers-powersource/2017/05/01/Registry-will-study-health-impact-from-living-near-shale-gas-wells/stories/201705010018>

<sup>1428</sup> Costa, D., Jesus, J., Branco, D., Danko, A., & Fiúza, A. (2017). Extensive review of shale gas environmental impacts from scientific literature (2010–2015). *Environmental Science and Pollution Research*, 24, 14579–14594. doi: 10.1007/s11356-017-8970-0

in order to prevent violence against women and other life changing negative effects linked to the industrial camps.<sup>1429</sup>

- February 8, 2017 – Los Angeles County health officials criticized as insufficient the allocation of only one million dollars by the Southern California Gas Company to fund an independent health study in the aftermath of the massive methane leak at Aliso Canyon that lasted from October 2015 until February 2016. “‘It’s a study, but not a health study,’ said Angelo Bellomo, the Los Angeles County deputy director for health protection. ‘It is not responsive to addressing the health needs and concerns to this community. More importantly, it’s inconsistent with advice given to [South Coast Air Quality Management District] by health officials.’” Health experts from across the state had suggested a design “that was comprehensive and larger in scope as well as consistent with a state Senate bill introduced last year that estimated such a design would cost \$13 million in the first three years, and up to \$40 million to complete.”<sup>1430</sup>
- January 19, 2017 – An epidemiologist at Brown University reviewed studies to date on health outcomes in communities living close to unconventional natural gas development, and identified areas requiring further study. “Future epidemiologic studies should implement personal exposure assessments to examine associations between individual contaminants and relevant health outcomes, particularly to explain associations seen with respiratory and birth outcomes,” the author concluded.<sup>1431</sup>
- December 5, 2016 – A team of British scientists wrote a 156-paper review on the risks and harms of fracking that attempts to “capture, review and interpret the published literature across all the accepted domains of public health in a systematic way and consider specific implications for the UK.” They concluded that shale gas fracking “unequivocally presents an exposure hazard,” and that further studies were needed to address exposure and health outcome data, noting the lack of before, during, and after exposure data for both air and water around drilling and fracking sites. Authors also noted that the claims that shale gas is less harmful to the climate than coal are not backed by lifecycle analyses. This team called for more research and a delay on any proposed drilling and fracking activity in the United Kingdom.<sup>1432</sup>

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<sup>1429</sup> Gibson, G., Yung, K., Chisholm, L., & Quinn, H., with Lake Babine Nation and Nak’azdli Whut’en. (2017). *Indigenous Communities and Industrial Camps: Promoting healthy communities in settings of industrial change*. Retrieved from [http://www.thefirelightgroup.com/thoushallnotpass/wp-content/uploads/2016/03/Firelight-work-camps-Feb-8-2017\\_FINAL.pdf](http://www.thefirelightgroup.com/thoushallnotpass/wp-content/uploads/2016/03/Firelight-work-camps-Feb-8-2017_FINAL.pdf)

<sup>1430</sup> Gazzar, B., & Abram, S. (2017, February 8). \$1 million health study ‘shortchanges’ Porter Ranch gas leak victims, critics say. *Los Angeles Daily News*. Retrieved from <https://www.dailynews.com/2017/02/08/1-million-health-study-shortchanges-porter-ranch-gas-leak-victims-critics-say/>

<sup>1431</sup> Stacy, S. L. (2017). A review of the human health impacts of unconventional natural gas development. *Current Epidemiology Reports*, 4, 38–45. doi: 10.1007/s40471-017-0097-9

<sup>1432</sup> Saunders, P.J., McCoy, D., Goldstein, R., Saunders, A. T., & Munroe, A. (2018). A review of the public health impacts of unconventional natural gas development. *Environmental Geochemistry and Health*, 40(1), 1-57. Advance online publication. doi: 10.1007/s10653-016-9898-x

- November 1, 2016 – The government of Scotland released a health impact assessment that reconfirmed the evidence for potential contamination of air and water, threats to worker health from silica dust exposure, and risks to the health of nearby residents.<sup>1433</sup>
- October 23, 2016 – In a unanimous vote of the society’s 300-member House of Delegates, the Pennsylvania Medical Society called for a moratorium on new shale gas drilling and fracking in Pennsylvania and an initiation of a health registry in communities with pre-existing operations.<sup>1434, 1435</sup>
- October 11, 2016 – A group of health care professionals in Massachusetts called for an immediate moratorium on major new natural gas infrastructure until the impact of these projects on the health of the communities affected can be adequately determined through a Comprehensive Health Impact Assessment.<sup>1436</sup> The group noted that the operation of natural gas facilities risks human exposures to toxic, cancer-causing, and radioactive pollution due to the presence of naturally co-occurring contaminants, toxic additives to the hydraulic fracturing process, and through the operation of transmission pipelines.<sup>1437</sup>
- September 15, 2016 – A systematic review of 45 studies, primarily but not exclusively addressing conventional oil and gas activities, showed an emerging body of evidence documenting harm to reproductive health from residential and occupational exposure to these operations. The strongest evidence existed for increased risk of miscarriage, prostate cancer, birth defects, and decreased semen quality. Authors state that there is “ample evidence for disruption of the estrogen, androgen, and progesterone receptors with individual chemicals and waste products related to oil and gas extraction,” and “impacts from unconventional oil and gas activities will likely be greater, given that unconventional activities have many similarities to conventional ones and employ dozens of endocrine-disrupting chemicals in the process of hydraulic fracturing.”<sup>1438</sup>
- September 14, 2016 – In a commentary about fracking in the *American Journal of Public Health*, Weill Cornell Medicine physicians wrote, “mounting empirical evidence shows harm to the environment and to human health . . . and we have no idea what the long-

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<sup>1433</sup> Health Protection Scotland. (2016). *A health impact assessment of unconventional oil and gas in Scotland, Vol. I*. Retrieved from <http://www.hps.scot.nhs.uk/resourcedocument.aspx?resourceid=3102>

<sup>1434</sup> Pennsylvania Medical Society (2016, October 23). Resolution 16-206: Pennsylvania Medical Society support for a moratorium on fracking. Retrieved from [https://www.pamedsoc.org/PAMED\\_Downloads/HODAEC/16-206.pdf](https://www.pamedsoc.org/PAMED_Downloads/HODAEC/16-206.pdf)

<sup>1435</sup> Hopey, D. (2016, October 28). Doctors call for a state ban on drilling and fracking. *Pittsburgh Post-Gazette*. Retrieved from <http://www.post-gazette.com/local/region/2016/10/27/Doctors-group-calls-for-moratorium-on-fracking-in-Pennsylvania/stories/201610270226>

<sup>1436</sup> Massachusetts Health Care Professionals Against Fracked Gas (2016, October). Call for a moratorium on natural gas projects undergoing construction or review in the Commonwealth of Massachusetts. Retrieved from <http://mhcpafg.org/>

<sup>1437</sup> Massachusetts Health Care Professionals Against Fracked Gas. (2016, February 20). The role of comprehensive health impact assessment in evaluating natural gas infrastructure proposals in Massachusetts. Retrieved from <http://mhcpafg.org/>

<sup>1438</sup> Balise, V. D., Meng, C-X., Cornelius-Green, J. N., Kassotis, C. D., Kennedy, R., & Nagel, S. C. (2016). Systematic review of the association between oil and natural gas extraction processes and human reproduction. *Fertility and Sterility*, 106(4). doi: 10.1016/j.fertnstert.2016.07.1099

term effects might be. . . . Ignoring the body of evidence, to us, is not a viable option anymore.”<sup>1439</sup>

- July 7, 2016 –The UK health professional organization Medact released an updated assessment of the potential health impacts of shale fracking in England that confirm the findings of its 2015 report, *Health and Fracking*. The new report, *Shale Gas Production in England*, concluded, “Our view that the UK should abandon its policy to encourage [shale gas production] remains unchanged.” The new report included hundreds of new academic papers addressing impacts on air and water quality, health, climate change, social wellbeing, economics, noise and light pollution, and seismic events. Still, authors wrote, “the absence of an independent social, health and economic impact assessment of [shale gas production] at scale is a glaring omission. Given the availability of alternative sources of energy, these are grounds for placing an indefinite moratorium on SGP (a position adopted by many jurisdictions across the world) until such time that there is greater clarity and certainty about the relative harms and benefits of shale gas.”<sup>1440</sup>
- May 31, 2016 – “There are too many science, technology and risk-assessment gaps to green-light fracking in western Newfoundland,” according to a panel that studied the question. In an interview with Canada’s *Globe and Mail*, panel leader and engineering professor Ray Gosine said, “The science, the studies that have been done, have been somewhat limited – certainly limited compared to what we’d expect to have done in order to plan this kind of operation.... There are a number of gaps and deficiencies that are significant.”<sup>1441</sup>
- May 13, 2016 – Physicians for Social Responsibility called for a ban on hydraulic fracturing, pointing both to the irremediable climate harm caused by methane emissions as well to the multiple health risks from industrial-scale water consumption, air pollution, seismic effects, the generation of large quantities of toxic liquid waste, and long-term impacts on drinking water aquifers. “We cannot stay healthy in an unhealthy environment. Nor can we survive indefinitely on a planet growing hotter and more prone to extreme, unpredictable and destructive weather. These factors impel PSR to call for a ban on fracking and for a rapid transition to cleaner, healthier, carbon-free sources of energy.”<sup>1442</sup>
- March 27, 2016 – Noting that many chemicals used in fracking fluids are known or suspected endocrine disruptors, a group of public health researchers called for an endocrine-centric component for health assessments in areas impacted by oil and gas operations. The team outlined a series of recommendations to assess the “potential

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<sup>1439</sup> Finkel, M. L., & Law, A. (2016). The rush to drill for natural gas: a five-year update. *American Journal of Public Health*, 106(10). doi: 10.2105/AJPH.2016.303398

<sup>1440</sup> McCoy, D. & Munro, A. (2016). *Shale gas production in England: An updated public health assessment*. Retrieved from [http://www.medact.org/wp/wp-content/uploads/2016/07/medact\\_shale-gas\\_WEB.pdf](http://www.medact.org/wp/wp-content/uploads/2016/07/medact_shale-gas_WEB.pdf)

<sup>1441</sup> Bailey, S. (2016, May 31). Too many gaps to recommend fracking in Newfoundland: Panel. *Globe and Mail*. Retrieved from <http://www.theglobeandmail.com/report-on-business/industry-news/energy-and-resources/too-many-unknowns-to-recommend-fracking-in-western-newfoundland-panel/article30216746/>

<sup>1442</sup> Physicians for Social Responsibility (2016, May 13). PSR position statement calling for a ban on hydraulic fracturing. Retrieved from <http://www.psr.org/assets/pdfs/psr-fracking-policy.pdf>

endocrine-related risks from chemical exposures associated with oil and natural gas operations. We present these recommendations in light of the growing body of information regarding both chemical concentrations in the environment and adverse health outcomes reported in humans and wildlife.”<sup>1443</sup>

- January 6, 2016 – A Yale University team of epidemiologists called for a systematic evaluation of chemicals in fracking fluid and wastewater for reproductive and development toxicity. While basic toxicity information is lacking for more than three-quarters of the more than 1,000 chemicals known to be used in fracking fluid, many of the remainder, the authors note, are linked to reproductive and developmental harm. “Therefore, carefully designed, rigorous exposure, and epidemiologic studies are urgently needed to investigate public health uncertainties.... The 67 chemicals we identified as possibly associated with either reproductive or developmental toxicity with a current or proposed federal drinking water standard or health-based guideline represent a feasible starting point for evaluation in future drinking water exposure studies or human health studies....”<sup>1444</sup>
- November 24, 2015 – A Harvard University team identified a trend toward increasing chemical secrecy and less transparency by examining 96,000 chemical disclosure forms filed by fracking companies between March 2011 and April 2015. These forms were submitted to the Fracfocus website, a chemical disclosure portal for the fracking industry that operates on a voluntary basis but for which reporting is mandated in more than 20 states. Fracfocus is the largest public database on chemicals used in U.S. fracking operations.<sup>1445</sup> Companies involved in fracking withheld chemical data at significantly higher rates in 2015 (16.5 percent) as compared to 2011-2013 (11 percent). The research team also found that withholding drops by a factor of four when companies report aggregate data without attribution to the specific products in the fracking fluid. The authors called for state governments to retain authority in requiring disclosure of “product-specific ingredient lists.”<sup>1446</sup>
- August 7, 2015 – While acknowledging the “dramatic increase in the number of peer-reviewed published studies” on environmental and health impacts of fracking, Weill Cornell Medical College’s Dr. Madelon Finkel and co-author PSE Healthy Energy’s Jake Hays called for more well-designed longer-term epidemiologic studies to quantify the connections between fracking-related risk factors and health outcomes. Without such studies it is challenging to capture, for example, outcomes such as cancer that take many

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<sup>1443</sup> Kassotis, C. D., Tillitt, D. E., Lin, C-H., Mcelroy, J. A., & Nagel, S. (2016). Endocrine-disrupting chemicals and oil and natural gas operations: Potential environmental contamination and recommendations to assess complex environmental mixtures. *Environmental Health Perspectives*, 124(3). doi: 10.1289/ehp.1409535

<sup>1444</sup> Elliot, E. G., Ettinger, A. S., Leaderer, B. P., Bracken, M. B., & Deziel, N. C. (2016). A systematic evaluation of chemicals in hydraulic-fracturing fluids and wastewater for reproductive and developmental toxicity. *Journal of Exposure Science and Environmental Epidemiology*. Advance online publication. doi: 10.1038/jes.2015.81

<sup>1445</sup> Song, L. (2015, Nov. 24). What chemicals are used in fracking? Industry discloses less and less. *InsideClimate News*. Retrieved from <https://insideclimatenews.org/news/24112015/fracking-natural-gas-drilling-chemicals-frac-focus-study>

<sup>1446</sup> Konschnik, K., & Dayalu, A. (2016). Hydraulic fracturing chemicals reporting: Analysis of available data and recommendations for policymakers. *Energy Policy*, 88. doi: 10.1016/j.enpol.2015.11.002

years to present. The authors described several important studies that are currently underway that will add to the body of knowledge in the future.<sup>1447</sup>

- June 9, 2015 – Information on individual exposures and local environmental conditions prior to the commencement of fracking in a given area is often “unavailable or hard to obtain. These and other data gaps have hindered the kind of large-scale epidemiological studies that can link exposures to actual health outcomes, with valid comparison groups,” wrote public health journalist David Tuller in the journal *Health Affairs*.<sup>1448</sup> In an interview with *Michigan Radio*, Tuller noted that, because well development happens quickly, there was generally a lack of pre-drilling baseline studies.<sup>1449</sup>
- April 17, 2015 – Using sophisticated Geographic Information Systems (GIS) tools to examine distribution of fracking wells compared to distribution of vulnerable populations, Clark University researchers found consistent evidence that, in the Pennsylvania Marcellus Shale region, census tracts with potential exposure to pollution from fracking wells contained “significantly higher” percentages of poor people. They also found clusters of vulnerable populations concentrated near drilling and fracking in all three states they studied: Pennsylvania (for poverty and elderly population), West Virginia (for poverty, elderly population, and education level) and Ohio (for children). Researchers also reported difficulty in accessing high quality and consistent unconventional well data in all three states, demonstrating an “urgent need” for common data collection and reporting.<sup>1450</sup> Another GIS-based study sought to begin to fill this gap in data on spatially distributed risks of fracking, identifying Pennsylvania populations at “very high” and “high” risk in over a dozen counties. The author called for more focus on those areas to understand the impacts of fracking.<sup>1451</sup>
- March 30, 2015 – The UK medical organization Medact published a report, *Health & Fracking: The Impacts and Opportunity Costs*, which concluded that fracking poses significant risks to public health and called for an immediate moratorium to allow time for a full and comprehensive health and environmental impact assessment to be completed.<sup>1452</sup> The report was supported by a letter published in the *British Medical Journal* calling for shale gas development to be put on hold, signed by the Climate and Health Council and over a dozen senior health professionals. The letter stated, “The arguments against fracking on public health and ecological grounds are overwhelming.

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<sup>1447</sup> Finkel, M. L. & Hays, J. (2015). Environmental and health impacts of ‘fracking’: Why epidemiological studies are necessary. *Journal of Epidemiology and Community Health*. Advance online publication. doi: 10.1136/jech-2015-205487

<sup>1448</sup> Tuller, D. (2015). As fracking booms, dearth of health risk data remains. *Health Affairs*, 34 (6), 903-906.

<sup>1449</sup> Williams, R. (June 9, 2015). Why there are gaps in public health studies on fracking. *Michigan Radio*. Retrieved from <http://michiganradio.org/post/why-there-are-gaps-public-health-studies-fracking#stream/0>

<sup>1450</sup> Ogneva-Himmelberger, Y., & Huang, L. (2015). Spatial distribution of unconventional gas wells and human populations in the Marcellus Shale in the United States: Vulnerability analysis. *Applied Geography*, 60, 165-174.

<sup>1451</sup> Meng, Q. (2015). Spatial analysis of environment and population at risk of natural gas fracking in the state of Pennsylvania, USA. *Science of the Total Environment*, 515-516, 198-206.

<sup>1452</sup> Medact. (2015). *Health & fracking: The impacts and opportunity costs*. London: McCoy, D. & Saunders, P.



There are clear grounds for adopting the precautionary principle and prohibiting fracking.”<sup>1453</sup>

- February 17, 2015 – Writing in the *Canadian Medical Association Journal*, a public health scientist and medical doctor briefly reviewed the human health risks of fracking documented to date and made the case for a health care worker role in insisting on improved understanding. They cited worker and community safety issues as the biggest short-term risks, but emphasized that more needs to be known “before health care providers can definitively respond to their patients’ and communities’ concerns.... Physicians may wish to advocate delaying new development activities until the potential health effects are better understood.”<sup>1454</sup>
- January 22, 2015 –The acting head of research at the Cancer Association of South Africa, Carl Albrecht, said that known carcinogenic chemicals used in fracking could lead to an epidemic of cancer in South Africa’s Karoo desert. As South Africa was poised to publish draft regulations, Albrecht said that the effect of fracking on human health was ignored.<sup>1455</sup>
- January 19, 2015 – In an article that reviewed research and research gaps, a team of British and U.S. medical and scientific professionals urged the United Kingdom and other nations to engage in science before engaging in fracking. They warned that even strong regulations may not effectively address air pollution from fracking, and that “permanent, adverse environmental, climatic, and population health impacts” may exist in some cases.<sup>1456</sup>
- December 17, 2014 – In an editorial, Rutgers University environmental exposure expert Paul J. Lioy (now deceased) highlighted fracking as an area in which accurate exposure monitoring and risk assessment did not yet exist. Lioy emphasized that the relevant research was compartmentalized and fragmented and that exposures and health outcomes around unconventional natural gas development need to be systematically addressed through “well-defined exposure studies in communities and workplaces.”<sup>1457</sup>
- December 5, 2014 – A team of medical and scientific researchers, including from the Institute for Health and Environment at the State University of New York (SUNY) at

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<sup>1453</sup> Stott, R., Atkinson, S., Montgomery, H., Rao, M., McKee, M., Gerada, C., . . . Popay, J. (2014). Public Health England’s draft report on shale gas extraction. *BMJ*, 348. Retrieved from <http://www.bmj.com/content/348/bmj.g2728/rr>

<sup>1454</sup> Bharadwaj, L. & Goldstein, B. D. (2015). Shale gas development in Canada: What are the potential health effects? *CMAJ*, 187(3), E99-E100.

<sup>1455</sup> Vecchiatto, P. (January 22, 2015). Chemicals used in fracking ‘could cause cancer.’ *Business Day BDlive*. Retrieved from <http://www.bdlive.co.za/business/energy/2015/01/22/chemicals-used-in-fracking-could-cause-cancer>

<sup>1456</sup> Hays, J., Finkel, M. L., Depledge, M., Law, A., & Shonkoff, S. B. C. (2015). Considerations for the development of shale gas in the United Kingdom. *Science of the Total Environment*, 512–513, 36–42. doi: 10.1016/j.scitotenv.2015.01.004

<sup>1457</sup> Lioy, P.J. (2015). Exposure science and its places in environmental health sciences and risk assessment: Why is its application still an ongoing struggle in 2014? *Journal of Exposure Science and Environmental Epidemiology*, 25, 1–3. doi: 10.1038/jes.2014.59

Albany, reviewed the scientific evidence that both adult and early life—including prenatal—exposure to chemicals from fracking operations can result in adverse reproductive health and developmental effects. These include: endocrine-disrupting chemicals potentially increasing risk for reproductive problems, breast cancer, abnormal growth and developmental delays, and changes in immune function; benzene, toluene and xylene (BTX chemicals) increasing risk for impaired sperm quantity and quality in men and menstrual and fertility problems in women; and heavy metals increasing the risk of miscarriage and/or stillbirths. Potential exposures occur through both air and water. Based on their review, the authors concluded, “Taken together, there is an urgent need for the following: 1) biomonitoring of human, domestic and wild animals for these chemicals; and 2) systematic and comprehensive epidemiological studies to examine the potential for human harm.”<sup>1458</sup> Lead author Susan Nagel said in an accompanying interview, “We desperately need biomonitoring data from these people. What are people actually exposed to? What are the blood levels of people living in these areas? What are the levels in the workers?”<sup>1459</sup>

- November 12, 2014 – A team of Australian researchers reviewed the strength of evidence for environmental health impacts of fracking based on publications from 1995 to 2014. They noted that the rapid expansion of fracking had outstripped the pace of science and that most studies focused on short-term, rather than long-term, health. Hence, “very few studies examined health outcomes with longer latencies such as cancer or developmental outcomes.” Noting that no evidence exists to rule out health impacts, the team called for direct and clear public health assessments before projects are approved, longitudinal studies that include baseline data, and government and industry transparency.<sup>1460</sup>
- September 15, 2014 – Researchers led by University of Rochester’s Environmental Health Sciences Center conducted interviews in New York, North Carolina, and Ohio to evaluate community health concerns about unconventional natural gas development. They identified many areas where more study is needed, including baseline measures of air quality, ongoing environmental monitoring, and health impact assessments. They noted that other areas where data are lacking involve the assessment of drilling and fracking impacts on vulnerable populations such as very young children, and the potential consequences of interactions between exposures resulting from shale gas extraction operations. Researchers suggested incorporating the input of potentially affected community members into the development of the research agenda.<sup>1461</sup>

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<sup>1458</sup> Webb, E., Bushkin-Bedient, S., Cheng, A., Kassotis, C. D., Balise, V., & Nagel, S. C. (2014). Developmental and reproductive effects of chemicals associated with unconventional oil and natural gas operations. *Reviews on Environmental Health*, 29(4), 307-318. doi: 10.1515/reveh-2014-0057

<sup>1459</sup> Sample, I. (2014, December 5). Fracking chemicals could pose risks to reproductive health, say researchers. *Guardian*. Retrieved from <http://www.theguardian.com/environment/2014/dec/05/fracking-chemicals-could-pose-risks-to-reproductive-health-say-researchers>

<sup>1460</sup> Werner, A.K., Vink, S., Watt, K., & Jagals, P. (2015). Environmental health impacts of unconventional natural gas development: A review of the current strength of evidence. *Science of the Total Environment*, 505, 1127–1141. doi: 10.1016/j.scitotenv.2014.10.084

<sup>1461</sup> Korfmacher, K. S., Gray, K. M., & Haynes, E. (2014, September 15). Health impacts of unconventional natural gas development: A comparative assessment of community information needs in New York, North Carolina, and Ohio. *Project Report, UR-UNC-UC Supplement 2012-13*. Retrieved from

- July 21, 2014 – An independent assessment report by Scientists for Global Responsibility and the Chartered Institute of Environmental Health reviewed current evidence across a number of issues associated with shale gas extraction by hydraulic fracturing, including environmental and public health risks, drawing on academic research. Among the report’s conclusions: there are major shortcomings in regulatory oversight regarding local environmental and public health risks; there is a large potential for UK shale gas exploitation to undermine national and international efforts to tackle climate change; the water-intensive nature of the fracking process which could cause water shortages in many areas; the complete lack of evidence behind claims that shale gas exploitation will bring down UK energy bills; and concerns that it will impact negatively on UK energy security. Despite claims to the contrary, the report noted that evidence of local environmental contamination from shale gas exploitation is well reported in the scientific literature. It emphasizes that, “[t]here are widespread concerns over the lack of evidence on fracking-related health impacts,” and that there is a lack of “substantive epidemiological study for populations exposed to shale gas extraction.”<sup>1462</sup>
- July 18, 2014 – A working group of the Environmental Health Sciences Core Centers, supported by the National Institute of Environmental Health Sciences, reviewed the available literature on the potential health impacts of fracking for natural gas. They concluded that further research is urgently needed. Needs identified included: monitoring of air and water quality over the entire lifetime of wells; further epidemiologic research addressing health outcomes and water quality; and research addressing whether air pollution associated with fracking increases the risk of pulmonary and cardiovascular disease. The working group advocated for the participation of potentially affected communities in all areas of research.<sup>1463</sup>
- July 12, 2014 – Eli Avila, Pennsylvania’s former Secretary of Health, said that health officials need to be proactive in protecting the public from the health effects of unconventional shale gas extraction. In 2011, funding was approved for a Pennsylvania public health registry to track drilling related complaints and address concerns, but was cut at the last minute. Speaking to the problem posed by the dearth of information, Avila asked, “How can you keep the public safe if you’re not collecting data?”<sup>1464</sup>
- June 30, 2014 – The immediate past chair of the Executive Committee of the Council on Environmental Health for the American Academy of Pediatrics, Jerome A. Paulson, MD,

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<http://www.urmc.rochester.edu/MediaLibraries/URMCMedia/environmental-health-sciences-center/COEC/documents/UNGD-information-needs-assessment-Final-project-report-091514.pdf>

<sup>1462</sup> Harrison, G., Parkinson, S., & McFarlane, G. (2014). Shale gas and fracking: examining the evidence. Published by Scientists for Global Responsibility (SGR) and the Chartered Institute of Environmental Health (CIEH). Retrieved from <http://www.cieh.org/WorkArea/showcontent.aspx?id=53520>

<sup>1463</sup> Penning, T. M., Breyse, P.N., Gray, K., Howarth, M., & Yan, B. (2014). Environmental health research recommendations from the Inter-Environmental Health Sciences Core Center Working Group on Unconventional Natural Gas Drilling Operations. *Environmental Health Perspectives*, 122(11), 1155-1159. doi: 10.1289/ehp.1408207

<sup>1464</sup> Associated Press. (2014, July 12). Expert: Pa. didn’t address fracking health impacts. *York Dispatch*. Retrieved from [http://www.yorkdispatch.com/ci\\_26135724/expert-pa-didnt-address-fracking-health-impacts](http://www.yorkdispatch.com/ci_26135724/expert-pa-didnt-address-fracking-health-impacts)

called for industry disclosure of all ingredients of fracking fluid; thorough study of all air contaminants released from drilling and fracking operations and their protected dispersal patterns; and study and disclosure of fracking-related water contamination and its mechanisms. In a letter to the Pennsylvania Department of Environmental Protection (PA DEP), Paulson said:

In summary, neither the industry, nor government agencies, nor other researchers have ever documented that [unconventional gas extraction] can be performed in a manner that minimizes risks to human health. There is now some evidence that these risks that many have been concerned about for a number of years are real risks. There is also much data to indicate that there are a number of toxic chemicals used or derived from the process, known or plausible routes of exposure of those chemicals to humans; and therefore, reason to place extreme limits on [unconventional gas extraction].<sup>1465</sup>

- June 20, 2014 – Highlighting preliminary studies in the United States that suggest an increased risk of adverse health problems among individuals living within ten miles of shale gas operations, a commentary in the British medical journal *The Lancet* called for a precautionary approach to gas drilling in the United Kingdom. According to the commentary, “It may be irresponsible to consider any further fracking in the UK (exploratory or otherwise) until these prospective studies have been completed and the health impacts of fracking have been determined.”<sup>1466</sup>
- June 20, 2014 – Led by an occupational and environmental medicine physician, a Pennsylvania-based medical and environmental science research team documented “... the substantial concern about adverse health effects of [unconventional natural gas development] among Pennsylvania Marcellus Shale residents, and that these concerns may not be adequately represented in medical records.” The teams identified the continued need to pursue environmental, clinical, and epidemiological studies to better understand associations between fracking, medical outcomes, and residents’ ongoing concerns.<sup>1467</sup>
- June 17, 2014 – A discussion paper by the Nova Scotia Deputy Chief Medical Officer and a panel of experts identified potential economic benefits as well as public health concerns from unconventional oil and gas development. On the health impacts, they wrote, “uncertainties around long term environmental effects, particularly those related to climate change and its impact on the health of both current and future generations, are considerable and should inform government decision making.” The report noted potential dangers including contamination of groundwater, air pollution, surface spills, increased

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<sup>1465</sup> Paulson, J.A. (2014, June 30). Letter to the Pennsylvania Department of Environmental Protection. Retrieved from <http://concernedhealthny.org/letter-from-dr-jerome-a-paulson-to-the-pennsylvania-department-of-environmental-protection/>

<sup>1466</sup> Hill, M. (2014, June 20). Shale gas regulation in the UK and health implications of fracking. *The Lancet*. Advance online publication. doi: 10.1016/S0140-6736(14)60888-6

<sup>1467</sup> Saberi, P., Propert, K. J., Powers, M. Emmett, E., & Green-McKenzie, J. (2014). Field survey of health perception and complaints of Pennsylvania residents in the Marcellus Shale region. *International Journal of Environmental Research and Public Health*, 11(6), 6517-6527. doi: 10.3390/ijerph110606517

truck traffic, noise pollution, occupational health hazards, and the generation of greenhouse gases. It also noted that proximity of potential fracking sites to human habitation should give regulators pause and called for a health impact assessment and study of long-term impacts.<sup>1468</sup> Responding to the report, the Environmental Health Association of Nova Scotia applauded the go-slow approach and called for a 10-year moratorium on fracking.<sup>1469</sup>

- May 29, 2014 – In New York State, more than 250 medical organizations and health professionals released a letter detailing emerging trends in the data on fracking that show significant risk to public health, air quality, and water, as well as other impacts. With signatories including the American Academy of Pediatrics, District II, the American Lung Association in New York, Physicians for Social Responsibility, and many leading researchers examining the impacts of fracking, they wrote, “The totality of the science — which now encompasses hundreds of peer-reviewed studies and hundreds of additional reports and case examples—shows that permitting fracking in New York would pose significant threats to the air, water, health and safety of New Yorkers.”<sup>1470, 1471</sup>
- May 9, 2014 – In a peer-reviewed analysis, leading toxicologists outlined some of the potential harm and uncertainty relating to the toxicity of the chemical and physical agents associated with fracking, individually and in combination. While acknowledging the need for more research and greater involvement of toxicologists, they noted the potential for surface and groundwater contamination from fracking, growing concerns about air pollution particularly in the aggregate, and occupational exposures that pose a series of potential hazards to worker health.<sup>1472, 1473</sup>
- May 1, 2014 – A 292-page report from a panel of top Canadian scientists urged caution on fracking, noting that it poses “the possibility of major adverse impacts on people and ecosystems” and that significantly more study is necessary to understand the full extent of the risks and impacts.<sup>1474</sup> The *Financial Post* reported that the panel of experts “found

<sup>1468</sup> Atherton, F. (2014, June 17). *Discussion paper: Hydraulic fracturing and public health in Nova Scotia*. Nova Scotia Hydraulic Fracturing Independent Review and Public Engagement Process.

<sup>1469</sup> Macdonald, M. (2014, June 17). Nova Scotia expert calls for go-slow approach for hydraulic fracturing. *The Canadian Press*. Retrieved from <http://www.calgaryherald.com/health/Health+studies+needed+hydraulic+fracturing+approved+Nova+Scotia/9946368/story.html>

<sup>1470</sup> Concerned Health Professionals of New York. (2014, May 29). Letter to Governor Cuomo and Acting Health Commissioner Howard A. Zucker. Retrieved from <http://concernedhealthny.org/letters-to-governor-cuomo/>

<sup>1471</sup> Hughes, K. (2014, May 29). NY fracking opponents call for moratorium of 3 to 5 years. *Daily Freeman*. Retrieved from <http://www.dailyfreeman.com/general-news/20140529/ny-fracking-opponents-call-for-moratorium-of-3-to-5-years>

<sup>1472</sup> Society of Toxicology. (2014). Toxicologists outline key health and environmental concerns associated with hydraulic fracturing. *ScienceDaily*. Retrieved from <http://www.sciencedaily.com/releases/2014/05/140509172545.htm>

<sup>1473</sup> Goldstein, B. D., Brooks, B. W., Cohen, S. D., Gates, A. E., Honeycutt, M. E., Morris, J. B., . . . Snawder, J. (2014). The role of toxicological science in meeting the challenges and opportunities of hydraulic fracturing [Abstract]. *Toxicological Sciences*, 139(2). doi: 10.1093/toxsci/kfu061

<sup>1474</sup> The Expert Panel on Harnessing Science and Technology to Understand the Environmental Impacts of Shale Gas Extraction. (2014). Environmental impacts of Hurricane Mitch. *Council of Canadian Academies*. Retrieved from

significant uncertainty on the risks to the environment and human health, which include possible contamination of ground water as well as exposure to poorly understood combinations of chemicals.”<sup>1475</sup>

- April 30, 2014 – Medical professionals spoke out on the dearth of public health information collected and lack of long-term study five years into Pennsylvania’s fracking boom. Walter Tsou, MD, MPH, past president of the American Public Health Association and former Health Commissioner of Philadelphia commented, “That kind of study from a rigorous scientific perspective has never been done.” Other experts added, “There has been more health research involving fracking in recent years, but every study seems to consider a different aspect, and ... there is no coordination.”<sup>1476</sup>
- April 17, 2014 – In the preeminent *British Medical Journal*, authors of a commentary, including an endocrinologist and a professor of clinical public health, wrote, “Rigorous, quantitative epidemiological research is needed to assess the risks to public health, and data are just starting to emerge. As investigations of shale gas extraction in the US have continually suggested, assurances of safety are no proxy for adequate protection.”<sup>1477</sup>
- April 15, 2014 – The *Canadian Medical Association Journal* reported on the increasing legitimacy of concerns about fracking on health: “While scientists and area residents have been sounding the alarm about the health impacts of shale gas drilling for years, recent studies, a legal decision and public health advocates are bringing greater legitimacy to concerns.”<sup>1478</sup>
- March 3, 2014 – In the *Medical Journal of Australia*, researchers and a physician published a strongly worded statement, “Harms unknown: health uncertainties cast doubt on the role of unconventional gas in Australia’s energy future.” They cited knowledge to date on air, water, and soil pollution, and expressed concern about “environmental, social and psychological factors that have more indirect effects on health, and important social justice implications” yet to be understood. They wrote in summary:

The uncertainties surrounding the health implications of unconventional gas, when considered together with doubts surrounding its greenhouse gas profile and cost, weigh heavily against proceeding with proposed future developments. While the health effects associated with fracturing chemicals have attracted considerable

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[http://www.scienceadvice.ca/uploads/eng/assessments%20and%20publications%20and%20news%20releases/shale%20gas/shalegas\\_fullreporten.pdf](http://www.scienceadvice.ca/uploads/eng/assessments%20and%20publications%20and%20news%20releases/shale%20gas/shalegas_fullreporten.pdf)

<sup>1475</sup> Canadian Press. (2014, May 1). Top Canadian scientists urge cautious approach to fracking until more known of impact. *Financial Post*. Retrieved from [http://business.financialpost.com/2014/05/01/top-canadian-scientists-urge-cautious-approach-to-fracking-until-more-known-of-impact/?\\_\\_lsa=3b44-76a1](http://business.financialpost.com/2014/05/01/top-canadian-scientists-urge-cautious-approach-to-fracking-until-more-known-of-impact/?__lsa=3b44-76a1)

<sup>1476</sup> Khan, N. (2014, April 30). Health impact of gas fracking left in the dark. *Pocono Record*. Retrieved from <http://www.poconorecord.com/apps/pbcs.dll/article?AID=/20140430/NEWS90/404300301/-1/NEWS01>

<sup>1477</sup> Law, A., Hays, J., Shonkoff, S. B., & Finkel, M. L. (2014). Public Health England’s draft report on shale gas extraction [Abstract]. *BMJ*, 1840. doi: <http://dx.doi.org/10.1136/bmj.g2728>

<sup>1478</sup> Glauser, W. (2014). New legitimacy to concerns about fracking and health. *Canadian Medical Association Journal*, 186(8), E245-E246. doi: 10.1503/cmaj.109-4725

public attention, risks posed by wastewater, community disruption and the interaction between exposures are of also of concern.<sup>1479</sup>

- March 1, 2014 – In the prestigious British medical journal *The Lancet*, researchers summarized workshops and research about the health impacts of fracking, noting that the scientific study on the health impacts of fracking is “in its infancy.” Nevertheless, the existing evidence suggests, said these researchers, that health risks posed by fracking exceed those posed by conventional oil and gas wells due to the sheer number and density of well pads being developed, their proximity to densely populated areas, and the need to transport and store large volumes of materials.<sup>1480</sup>
- February 24, 2014 – In a review of the health effects of unconventional natural gas extraction published in the journal *Environmental Science & Technology*, leading researchers identified a range of impacts and exposure pathways that can be detrimental to human health. Noting how fracking disrupts communities, the review states, “For communities near development and production sites the major stressors are air pollutants, ground and surface water contamination, truck traffic and noise pollution, accidents and malfunctions, and psychosocial stress associated with community change.” They concluded, “Overall, the current scientific literature suggests that there are both substantial public concerns and major uncertainties to address.”<sup>1481</sup>
- August 30, 2013 – A summary of a 2012 workshop by the Institute of Medicine Roundtable on Environmental Health Sciences, Research, and Medicine featured various experts who discussed health and environmental concerns about fracking and the need for more research. The report in summary of the workshop stated, “The governmental public health system, which retains primary responsibility for health, was not an early participant in discussions about shale gas extraction; thus public health is lacking critical information about environmental health impacts of these technologies and is limited in its ability to address concerns raised by regulators at the federal and state levels, communities, and workers employed in the shale gas extraction industry.”<sup>1482</sup>
- June 2013 – A group of three nursing professors published a cautionary review questioning the rollout of new shale-based energy practices at a time when, “anecdotal reports make clear that the removal of fossil fuels from the earth directly affects human health.” Although the results of longterm studies are not yet available, the authors point to emerging evidence for negative human and ecologic health effects of fracking.

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<sup>1479</sup> Coram, A., Moss, J., & Blashki, G. (2014). Harms unknown: Health uncertainties cast doubt on the role of unconventional gas in Australia's energy future. *The Medical Journal of Australia*, 200(4), 210-213. doi: 10.5694/mja13.11023

<sup>1480</sup> Kovats, S., Depledge, M., Haines, A., Fleming, L. E., Wilkinson, P., Shonkoff, S. B., & Scovronick, N. (2014). The health implications of fracking. *The Lancet*, 383(9919), 757-758. doi: 10.1016/S0140-6736(13)62700-2

<sup>1481</sup> Adgate, J. L., Goldstein, B. D., & McKenzie, L. M. (2014). Potential public health hazards, exposures and health effects from unconventional natural gas development [Abstract]. *Environmental Science & Technology*. doi: 10.1021/es404621d

<sup>1482</sup> Coussens, C., & Martinez, R. (2013). *Health impact assessment of shale gas extraction: workshop summary*. Washington: The National Academies Press. Retrieved from <http://www.iom.edu/Reports/2013/Health-Impact-Assessment-of-Shale-Gas-Extraction.aspx>

Furthermore, they continue, “sufficient evidence has been presented to the [American Nurses Association], the American Public Health Association, and the American Medical Association’s Resident and Fellow Section to result in a call for a moratorium on the issuance of new fracking permits nationally.” They urge nurses to contribute to keeping health issues “front and center as we address national energy needs and policies.”<sup>1483</sup>

- April 22, 2013 – In one of the first peer-reviewed nursing articles summarizing the known health and community risks of fracking, Professor Margaret Rafferty, Chair of the Department of Nursing at New York City College of Technology wrote, “Any initiation or further expansion of unconventional gas drilling must be preceded by a comprehensive Health Impact Assessment (HIA).”<sup>1484</sup>
- May 10, 2011 – In the *American Journal of Public Health*, two medical experts cautioned that fracking “poses a threat to the environment and to the public's health. There is evidence that many of the chemicals used in fracking can damage the lungs, liver, kidneys, blood, and brain.” The authors urged that it would be prudent to invoke the precautionary principle in order to protect public health and the environment.<sup>1485</sup>

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<sup>1483</sup> McDermott-Levy, R., Kaktins, N., & Sattler, B. (2013). Fracking, the environment, and health: New energy practices may threaten public health. *American Journal of Nursing*, 113(6), 45-51.

<sup>1484</sup> Rafferty, M. A., & Limonik, E. (2013). Is shale gas drilling an energy solution or public health crisis? *Public Health Nursing*, 30(5), 454-462. doi: 10.1111/phn.12036

<sup>1485</sup> Finkel, M. L., & Law, A. (2011). The rush to drill for natural gas: A public health cautionary tale. *American Journal of Public Health*, 101(5), 784-785. doi: 0.2105/AJPH.2010.300089



# Public Health and Safety Risks of Oil and Gas Facilities in Los Angeles County

Los Angeles County Department of Public Health

February 2018



*A tank farm and oil well in the backyard of a house on Firmin Street in Echo Park, California (August 2016)*



COUNTY OF LOS ANGELES  
**Public Health**

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## Executive Summary

Oil and gas development in the Los Angeles Basin presents unique public health and safety concerns, because some oil and gas reserves lie beneath densely populated urban areas. Future production from these natural reserves will primarily come from existing oil fields, with some potential for the development of undiscovered oil and gas resources using conventional or unconventional methods. This report is intended to provide local policy-makers with an overview of relevant public health research and investigations. It concludes with an overview of measures to reduce potential health impacts.

There are currently 68 active oil fields in the Los Angeles Basin, with facilities operating under a wide range of operational and environmental conditions. While some facilities have been subject to stricter design and mitigation measures, others have not been required to conduct health risk assessments or other environmental studies. In some neighborhoods, such as South Los Angeles, residences are located only several feet away from the boundary of a drilling site and as close as 60 feet from an active oil well. Two smaller neighborhood facilities, which the Los Angeles County Department of Public Health (DPH) has responded to concerns or complaints, were found in a state of disrepair with environmental conditions that impact the health of neighboring residents.

In this report, DPH synthesized information from multiple lines of evidence, including a review of epidemiological literature, environmental and health impact assessments, neighborhood health investigations, and consultations with various jurisdictions regarding oil and gas ordinances. The scope of each is described below.

**Epidemiological Literature:** The review of the scientific literature synthesizes information from epidemiological studies and other published reviews on the potential health impacts associated with living near oil and gas activities. These peer-reviewed studies examine a variety of short-term and long-term health indicators such as birth outcomes; cancer; and respiratory neurological, gastrointestinal, dermatological, and psychological effects. While epidemiological studies have found limited associations between adverse health effects and living near oil and gas operations, high-quality exposure data measured over long periods of time is lacking. Therefore, the epidemiological studies are not able to conclude whether or not living near oil and gas activities is associated with long-term health impacts.

**Environmental and Health Impact Assessments:** These impact assessments help to fill data gaps in the literature by predicting potential health and safety impacts from air emissions, odors, noise, vibration, and other environmental hazards associated with oil and gas development projects. However, it should be noted that conventional risk assessment tools can be limited in their ability to anticipate certain risks given the complexity of health and quality-of-life consequences and the need for more robust,

local-level monitoring data. The mitigation measures proposed for specific projects can be used to inform policies and plans involving oil and gas activities and operations that do not require such assessments to avoid or minimize potential adverse impacts.

**Neighborhood Health Investigations:** When DPH is notified of environmental or operational conditions at industrial facilities that may pose a threat to public health, DPH conducts a neighborhood health investigation and recommends action to protect and preserve public health. In response to community health complaints, DPH conducted two neighborhood health investigations of oil and gas facilities located in densely populated communities. In both investigations, DPH responded to resident health complaints of headaches, nausea, vomiting, respiratory irritation, and eye, nose and throat irritation. Such impacts often warrant immediate action to protect health. These two neighborhood health investigations revealed insufficient regulatory oversight and inadequate mitigation measures to reduce exposures and associated impacts in the adjoining community.

**Consultations with Other Jurisdictions:** To understand oil and gas ordinances adopted by other jurisdictions, DPH conducted one-on-one interviews with 10 jurisdictions throughout the nation and convened one joint meeting. These jurisdictions have established requirements, such as setback distances and/or mitigation measures, to limit adverse health and safety impacts of oil and gas production.

DPH determined that there is sufficient evidence to provide the following guidance for oil and gas facilities in order to protect health:

1. Los Angeles County and local jurisdictions within the County should expand the minimum setback distance beyond 300 feet, as currently specified in local zoning code, and apply these requirements to both the citing of new wells and to the development of sensitive land uses near existing operations. It is important to note that a setback distance is not an absolute measure of health protection and additional mitigation measures must also be considered. For existing oil and gas operations, a site-specific assessment at each facility throughout the County is necessary to identify current distances to sensitive land uses and other site characteristics that can be used to inform whether further mitigation measures are warranted to reduce potential public health and safety risks.

Table ES-1 below summarizes various setback distances, mitigation targets, remaining hazards and whether additional mitigation measures could further reduce potential adverse impacts.



**Table ES-1. Review of Key Public Health and Safety Hazards and Setback Distance Guidance**

<b>Setback Distance</b>	<b><i>Air Quality</i></b>	<b><i>Noise</i></b>	<b><i>Odors</i></b>	<b><i>Fires, Explosions, and Other Emergencies</i></b>	<b><i>Additional Mitigation and Assessment Notes</i></b>
<b>300 feet</b>					Some health and safety impacts may still be unavoidable regardless of additional mitigation.
<b>600 feet</b>	✓				Additional mitigation and assessment would likely be needed to avoid most impacts. Odors may be unavoidable, regardless of mitigation. Air monitoring is advised.
<b>1,000 feet</b>	✓	✓			Additional mitigation and assessment may be needed to avoid noise impacts during certain operations, e.g. well advancement. Odors may be unavoidable in loss of containment events, regardless of additional mitigation.
<b>1,500 feet</b>	✓	✓	✓		Additional mitigation not likely to be needed. Some uncertainty remains due to gaps in long-term health and exposure data.

This table is based on information compiled from scientific publications,<sup>13,37,51,52</sup> environmental impact assessments,<sup>27-33</sup> other environmental studies,<sup>10,16,20,34,35,36,46</sup> and experiences in other jurisdictions.

✓ Represents the distance at which the impact is likely mitigated

2. In coordination with the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD), Los Angeles County should require the operators of facilities within urban areas of the County to implement continuous air monitoring systems around oil and gas operations to:
  - Measure air pollutants released by oil and gas operations;
  - Ensure oil and gas sites comply with environmental regulations;
  - Evaluate the impact of releases from oil and gas sites on surrounding neighborhoods; and
  - Monitor setbacks for these sites regularly, based on air monitoring and emerging science, and revise setback distances and/or other mitigation requirements when necessary to protect public health.

It should be noted that SCAQMD has imposed some requirements related to public notification and monitoring, but only after concerns are identified at a particular oil and gas operation, such as odor complaints. Current monitoring and enforcement activities can be sporadic, and it is difficult to understand long-term exposure risks for people living near oil and gas operations in the absence of continuous monitoring. To better characterize air quality in communities near oil and gas operations, SCAQMD completed a fenceline monitoring study and CARB launched the Study of Neighborhood Air near Petroleum Sources (SNAPS); results from these efforts should be used to inform air monitoring policies.

3. A variety of state and federal regulations require routine inspections, maintenance, testing and leak detection systems for oil and gas facilities; however, local oversight of these regulations is limited. Optimal local oversight would reduce public health and safety risks associated with aging infrastructure, and should include a local auditing and certification process, streamlined coordination, and data sharing among agencies. A local auditing program would confirm that operators are complying with federal, state and local regulations.
4. Operators should prepare and make available to the public a comprehensive Community Safety Plan, in coordination with City and County departments, including Fire, Building and Safety, and Law Enforcement. These plans should include information on hazardous chemicals stored onsite; air emission monitoring efforts; and health-based thresholds to identify the need for additional mitigation. For operations to plug wells permanently or to perform well maintenance, the responsible party should also prepare and implement a Community Safety Plan. The Community Safety Plan should facilitate communication and input from local stakeholders, and be submitted to DPH for review and approval. The Plan should include protocols and procedures for immediate notification to the County Health Officer in the event of odor or health complaints.

5. Operators should maintain enhanced Emergency Preparedness Plans that account for proximity to sensitive land uses. These plans must include communication procedures to immediately notify local government agencies of any emergencies, such as spills or other releases.

To further inform health-protective policies and regulations, DPH will collaborate with County partners, local and state enforcement agencies, and interested stakeholders. DPH recommends site-specific assessments at existing oil and gas operations located near sensitive land use to determine the appropriate combination of setback distance and additional mitigation measures, as well as the extent to which these measures are sufficient to protect public health.

## I. Introduction

Oil and gas development in the Los Angeles Basin presents unique public health and safety concerns, because some oil and gas reserves lie beneath densely populated urban areas. Future production from these natural reserves will primarily come from its 68 active oil fields, with some potential for the development of undiscovered oil and gas resources using conventional or unconventional methods.<sup>1,2</sup> Public concern has led to recent legislation and rules to assess the health and safety risks of oil and gas production, including California Senate Bill 4 to assess unconventional well stimulation treatments<sup>3</sup> and South Coast Air Quality Management District (SCAQMD) Rule 1148.2 requiring oil and gas operators to report chemicals used in drilling, rework, or completion processes.<sup>4</sup>

Health and safety risks of oil and gas production are particularly relevant to residents of Los Angeles County, which is the second largest oil producing county in California.<sup>5</sup> There are 3,468 active and 1,850 inactive oil and gas wells countywide.<sup>5</sup> Although oil and gas production in Los Angeles County occurs in both rural and urban areas, the potential public health impacts of oil and gas sites located in densely populated areas are concerning, particularly to those who experience disproportionate economic and health inequities.

Some communities within Los Angeles County have developed and adopted ordinances to regulate oil and gas drilling within their jurisdictions. One example is the Baldwin Hills Community Standards District that was adopted in 2008 for the Inglewood Oil Field, the largest urban oil field in the U.S. This site has undergone extensive environmental review and operates under a set of regulatory requirements to ensure ongoing monitoring of air quality, groundwater, noise, and seismic activity; establish setback distances from sensitive areas and emergency response protocols; and hold monthly meetings with a community advisory panel.<sup>6</sup> Wells in other parts of the county are not subject to the same level of oversight, and operate with various permit conditions and regulations depending on the project.<sup>7</sup>

On March 29, 2016, the Board passed a motion instructing the departments of Regional Planning, Fire, Public Health, and Public Works to convene an Oil and Gas Strike Team to assess the conditions, regulatory compliance, and potential public health and safety risks associated with existing oil and gas facilities in the unincorporated areas of Los Angeles County.<sup>7</sup> DPH participated in site assessments with regulatory agencies as an active member of the Oil and Gas Strike Team. A key component of the motion is an assessment of the potential public health and safety risks using a Public Health Screening Assessment (Appendix A). This is a complex task, considering (1) the wide variety of oil and gas operations encountered across the County; (2) the proximity of people living, working and going to school near operations; (3) the multitude of potential chemical and physical hazards if operations and storage are not properly managed; and (4) uncertainties with regards to a lack of long-term exposure and health data.

The Oil and Gas Strike Team conducted site visits to 15 oil and gas facilities currently operating in unincorporated Los Angeles County, including 68.5% of wells identified for review (557 out of 813 wells). An additional nine facilities operating in the unincorporated County were not inspected by the Oil and Gas Strike Team because access was not granted by the operators. The Public Health Screening Assessment based public health, safety, and environmental risks primarily on four priority areas: the facility's hydrogen sulfide gas content in production, operating pressures of wells and equipment, drilling frequency, and proximity to nearby populations.

Among the sites visited by the Oil and Gas Strike Team, the final report notes that public health risk levels were considered "low" for risks associated with hydrogen sulfide gas, operating pressures, and drilling frequency.<sup>8</sup> Several facilities were ranked "high" by the Public Health Screening Assessment for proximity to residences or sensitive receptor locations. Notably, the Oil and Gas Strike Team found that six of the 15 facilities had wells or tanks less than 300 feet from the nearest residence or school; two of those sites had more than 60 wells situated less than 300 feet from occupied structures.<sup>8</sup> The County Zoning Ordinance requires a 300-foot setback from residences for drilling oil wells in certain land-use zones;<sup>9</sup> however, the ordinance does not apply to wells drilled prior to its adoption or to wells that preceded construction of nearby structures.

The final report<sup>8</sup> by the Oil and Gas Strike Team recommended that Los Angeles County further evaluate the following key areas:

- Removal of "by right" permitting (as required by the Board Motion)<sup>7</sup>
- Setback distances
- Well stimulation techniques (to reflect state regulations)
- Air quality and odor monitoring
- Transportation of chemicals in residential areas
- Pipeline monitoring and leak detection
- Abandonment of long idle wells
- Emergency Response Plans
- Communication with surrounding community

In addition to participating on the Oil and Gas Strike Team, DPH also consulted with the City of Los Angeles' Petroleum Administrator who is currently assessing the public health and economic impacts of requiring a buffer distance around oil and gas facilities in its jurisdiction. This DPH report is intended to provide local policy-makers with an overview of public health research and investigations to inform potential revisions to local oil and gas ordinances and land use zoning codes.

## II. Epidemiological Literature

The epidemiological literature on public health and safety impacts of oil and gas activities has been increasing in recent years; however, data gaps and uncertainties remain. A growth in research over the last decade has been driven by public concern regarding potential environmental and health impacts of specific oil and gas production techniques, such as hydraulic fracturing (i.e. fracking), used to increase output from oil and gas reserves. It is estimated that 26% of active wells in the Los Angeles Basin have been stimulated by methods such as hydraulic fracturing, frac-packing, or high-rate gravel packing.<sup>1</sup>

Future development of the Los Angeles Basin is expected to mainly come from conventional oil reserves in existing fields. Unlike unconventional resources such as “shale oil,” hydraulic fracturing is not routine practice for oil production from conventional resources.<sup>1</sup> However, the public health risks associated with oil and gas operations are not unique to activities that use well stimulation such as hydraulic fracturing. For example, all oil and gas wells use hazardous chemicals and emit toxic air emissions such as benzene, a known human carcinogen.<sup>2</sup> A study of chemical usage data related to oil and gas activities in Southern California found substantial overlap between chemicals used in hydraulic fracturing and those used in routine oil and gas activities such as well maintenance, well completion, or rework.<sup>10</sup> Therefore, this literature review is comprised of epidemiological studies of health impacts from both conventional and unconventional drilling activities.

DPH compiled information from six comprehensive literature reviews<sup>11-16</sup> of epidemiological studies evaluating population health effects from oil and gas activities from peer-reviewed journals and grey literature. These literature reviews focused on evaluating short-term and long-term health indicators such as birth outcomes; cancer; and respiratory, neurological, gastrointestinal, dermatological, and psychological effects. These reviews included studies of oil and gas activities with a wide range of operational and environmental conditions.

A summary of findings from the available literature is described below.

### Birth Outcomes

Particulate matter and other toxic air pollutants, such volatile organic compounds (VOCs), have been associated with adverse reproductive and developmental effects.<sup>17,18</sup> A systematic review of 45 studies found strong evidence for the disruption of human sex steroid hormone receptors; and moderate evidence for increased risk of preterm birth, miscarriage, birth defects, decreased semen quality, and prostate cancer.<sup>12</sup> The majority of the studies included in the review examined individual chemicals, complex mixtures of chemicals, and waste products related to conventional oil and gas operations. Other epidemiological studies have evaluated whether living near oil and gas operations during pregnancy is associated with adverse birth outcomes (e.g. preterm birth, low birthweight, or low APGAR scores), but the findings are mixed, with some studies showing an association and others no association.<sup>19</sup> Many of the epidemiological studies

have methodological limitations, but given that some of the findings suggest potentially serious health impacts such as birth defects,<sup>17</sup> further study is warranted.

### **Cancer**

Oil and gas activities may expose individuals to airborne emissions of VOCs, such as benzene. Studies have shown that exposure to elevated levels of benzene over many years may increase the risk of developing cancer, particularly acute myelogenous leukemia.<sup>11</sup> However, studies examining associations between oil and gas activities and other cancers in adults and children have resulted in mixed findings or null associations. There is insufficient evidence to quantify the contribution of oil and gas operations to incidence of childhood cancers. Studies are limited in both the ability to determine such an association due to methodological challenges to quantify an individual's exposure over time, and the ability to control for other environmental and genetic factors that may contribute to overall risk of developing cancer. For further information on VOC air emissions and potential cancer health risks, refer to Section III.

### **Respiratory Effects**

Air emissions from local oil and gas wells have been shown to contribute substantially to the pollution burden from stationary sources in Los Angeles County.<sup>20</sup> Particulate matter and VOCs are often associated with oil and gas extraction activities, and can lead to harmful human health effects, including eye, nose and throat irritation; exacerbations of asthma; and other respiratory conditions. These emissions are known to present a more significant health threat to infants and children.<sup>14</sup> A recent review reported mixed evidence of an association between proximity to oil and gas operations and self-reported respiratory symptoms.<sup>16</sup> On the other hand, acute adverse respiratory health effects (e.g. cough, wheezing, breathlessness), have been well documented in emergency response and disaster events, such as oil spills.<sup>21,22</sup> Less is known about long-term health effects after disaster events, but one study found respiratory effects among clean-up workers of an oil spill persisted five years later.<sup>23</sup> There is need for further study of potential respiratory health effects of long-term exposure to air emissions during normal operations, using study methods that do not rely solely on self-reported measures.

### **Neurological Effects**

Inhalation of VOCs emitted during improperly regulated oil and gas activities can lead to neurological effects such as headaches, dizziness, and other impacts to the central nervous system. Studies examining neurological symptoms and exposure to VOCs have relied on hospitalizations and self-reported data, with some studies finding an association and others reporting no association. In a large survey-based study, Tustin et al. found an association between people living near natural gas development activities and migraine headaches.<sup>24</sup> The likelihood of reporting migraines was 43 times greater in the area with the most natural gas development activity compared to an area with no natural gas activity. Although there are major limitations to this study, including bias in self-reported symptoms and other factors that

contribute to migraines, the results suggest a potential relationship between natural gas activity and adverse neurological effects.

### **Gastrointestinal Effects**

A limited number of studies have examined gastrointestinal effects, such as nausea or abdominal pain, and proximity to oil and gas activities. Studies of oil spill clean-up workers have documented gastrointestinal symptoms (nausea and vomiting) among the acute health problems related to duration of work and working in a highly polluted zone.<sup>21</sup> These studies have not demonstrated an association or have provided insufficient evidence to rule out an association between proximity to oil and gas operations and gastrointestinal symptoms.

### **Dermatological Effects**

Direct contact with petroleum product, such as crude oil, is known to cause skin irritation.<sup>25</sup> A limited number of studies have found associations between living near oil and gas operations and self-reported dermal symptoms.<sup>11</sup> Oily mist releases of crude oil from oil and gas operations<sup>26</sup> may result in oily residue on surfaces that can lead to skin irritation if people come in direct contact with the impacted areas.

### **Psychological Effects**

Oil and gas activities can adversely affect the mental health, well-being, and quality of life for nearby residents. Multiple factors, including both chemical and non-chemical stressors, may contribute to increased risk of suffering from depression, anxiety, fatigue, and sleep deprivation. Hays et al. reviewed health impacts of noise exposure near oil and gas activities and found a link between noise levels from such operations and increases in reported sleep disturbance.<sup>13</sup> Tustin et al. found an association between living near oil and gas activities and symptoms of fatigue.<sup>24</sup> Studies examining associations between proximity to oil and gas activities and self-reported psychological effects have offered mixed results.

### **Limitations of Health Studies**

Determining a link between oil and gas production and health impacts based on reviews of the literature is challenging because of the inherent limitations of epidemiological studies. The analyses in these studies typically cannot confirm whether past exposures to chemicals from oil and gas activities are associated with health effects among nearby residents, because of the limitations associated with small sample sizes, and the inability to reliably detect small increases in risk. There is also typically a lack of information on individual levels of exposure to emissions to establish dose-response curves and temporal relationships, as well as other factors that could cumulatively influence health risk, including exposure to the same chemicals from other sources, such as local vehicle traffic.



## Summary

Epidemiological studies are observational, and by themselves cannot determine causal relationships between exposures from oil and gas production and specific health effects; however, they provide useful information to guide future research. Studies with well-designed exposure monitoring and measurements are needed to elucidate the actual health implications for populations near oil and gas sites. Meanwhile, acute adverse health effects have been well documented in emergency response and disaster events involving oil and gas operations such as oil spills.<sup>9,21,22</sup> The literature to date provides limited evidence to link adverse health effects to living near oil and gas operations; however, quality exposure data that measures people's exposure over long periods of time is missing. Findings from existing epidemiological studies are not able to conclude whether or not living near oil and gas activities is associated with long-term health effects, but rather highlight the need for further research. Given the limitations of epidemiological studies, comprehensive exposure monitoring of oil and gas activities is needed, and precautionary measures are appropriate to minimize exposures to substances that may adversely affect health.

### III. Environmental and Health Impact Assessments

DPH evaluated seven Environmental Impact Reports (EIRs)<sup>27-33</sup> and two Health Impact Assessments (HIAs)<sup>34,35</sup> conducted for conventional and unconventional oil and gas production sites primarily in California from 2008 to 2017. Additionally, DPH reviewed a comprehensive health risk assessment recently completed by the Colorado Department of Public Health and Environment (CDPHE).<sup>16</sup> EIRs and HIAs are particularly helpful in providing an indication of potential public health risks until more comprehensive exposure monitoring and high-quality health studies can be conducted.

#### **Air pollution**

The release of chemicals into the air from oil and gas activities can occur from surface operations, wells and pipelines, operation of diesel or gas-powered equipment and vehicles, as well as accidental releases. Primary air pollutants include nitrogen oxides, particulate matter, benzene, toluene, ethylbenzene, xylene, hexane, and polycyclic aromatic hydrocarbons. Over 300 chemicals associated with drilling fluids present public health concerns ranging from respiratory health effects to development of cancer, if not properly monitored and controlled.

Data on air emissions from oil and gas sites at the local level are limited. One air monitoring study looked at particulate matter, heavy metals, and VOCs near Los Angeles' Inglewood Oil Field, noted a "marginal" contribution of particulate matter and "negligible" contribution of metals as compared to air emissions monitored throughout the Los Angeles region.<sup>36</sup> Note that the VOC sampling duration was only two weeks, making interpretation limited for comparison with annual averages used in regional air monitoring data. The CARB is launching a Study of Neighborhood Air near Petroleum Sources (SNAPS) to better characterize emissions of VOCs and other air pollutants from oil and gas wells throughout California.

Some studies indicate that oil and gas wells are substantial contributors to the local air pollution burden from VOCs in the Los Angeles area.<sup>20,37</sup> In the 2015 FluxSense Study, the SCAQMD monitored air quality around 61 sites and estimated that oil and gas wells contribute to more than half of the estimated VOC emissions from stationary sources.<sup>20</sup> This differs from previous estimates presented in the SCAQMD 2016 Air Quality Management Plan that utilized emission inventory data and concluded oil and gas wells contribute to 1% of VOCs from stationary sources.<sup>38</sup> While the 2015 FluxSense project notes uncertainties associated with its method of scaling data to represent the Los Angeles Basin as a whole, it suggests that emissions of VOCs from oil and gas sites may be considerably underestimated compared to emission inventories, and further study is warranted.

The Colorado Department of Public Health and Environment recently conducted a comprehensive health risk assessment using statewide air emissions data.<sup>16</sup> Non-cancer\* and cancer<sup>†</sup> health risk estimates were calculated for 62 priority chemicals measured at distances of 500 feet or greater from oil and gas operations with a wide range of conditions and mitigation measures. Although the Colorado study concluded that non-cancer and cancer health risks were below regulatory thresholds, they exceeded risk management levels typically used in the state of California. For non-cancer health effects from long-term exposures, the risk estimates exceeded the U.S. Environmental Protection Agency (EPA) hazard index of 1.0 for three health effect categories: neurological; eye, nose and throat; and respiratory. In addition, the combined exposure to four cancer-causing substances (benzene, ethylbenzene, formaldehyde and acetaldehyde) reached the EPA risk management level of 1 excess cancer per 10,000 people exposed and exceeded the California EPA Proposition 65 risk threshold of 1 excess cancer per 100,000.<sup>39‡</sup> The study did not calculate health risks at distances of less than 500 feet because Colorado requires a 500-foot minimum buffer distance between oil and gas activities and buildings. These findings suggest that mitigation controls may be needed in addition to the existing setback distance in order to reduce the potential health risks from air emissions from local oil and gas operations.<sup>40,41</sup>

Many of the project-specific EIRs for oil and gas development reviewed for this report predicted significant impacts from not only the drilling of new wells but also from construction, traffic, and other activities related to the project. The EIRs also include project-specific mitigation measures or alternatives that could be used to reduce or eliminate toxic air emissions associated with the project. Examples of mitigation measures included requiring emission controls for operational equipment and vehicles, as well as air monitoring to evaluate the effectiveness of those measures.

The Air Toxics “Hot Spots” Information and Assessment Act enacted in California in 1987 (Assembly Bill 2588) requires Health Risk Assessments for “high-priority” facilities that emit toxic air pollutants, including prioritized oil and gas facilities. SCAQMD prioritizes facilities based on toxicity and volume of hazardous materials released from a facility, as well as the proximity of a facility to sensitive populations such as residences, schools, daycare centers and hospitals.<sup>42</sup> However, not all oil and gas development projects are required to conduct a Health Risk Assessment.

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\* For non-cancer health effects, the health-based reference value is the exposure level below which health effects are not expected to occur, even for potentially sensitive people in the general population.

† For cancer causing substances, there are no safe levels of exposure.

‡ CDPHE reported the combined cancer risk estimate was  $9.7 \times 10^{-5}$ .

## Odors

Hydrogen sulfide ( $H_2S$ ) occurs naturally in crude petroleum and natural gas and is also a by-product of desulfurization processes in oil and gas industries. It is an odor with a “rotten-egg” smell that may be associated with some oil fields in the Los Angeles Basin. Hydrogen sulfide has a low odor threshold, defined as the lowest concentration perceivable by human smell, ranging 0.008 to 0.13 parts per million (ppm).<sup>43</sup> Detection of odors due to hydrogen sulfide varies considerably in the human population and can lead to symptoms such as headaches and nausea, as well as eye, nose, throat and respiratory irritation, in addition to being able to adversely impact overall quality of life and wellbeing. California Environmental Protection Agency (CalEPA) has adopted a threshold of 0.008 ppm for long-term exposure to hydrogen sulfide.<sup>44</sup>

Odors may also be the first indication of accumulation of gases which may reach hazardous levels in confined spaces if left unchecked. Historical case studies serve as reminders of the potential for hydrogen sulfide gases to migrate to the surface. For example, the Edward R. Roybal Learning Center (formerly known as the Belmont Learning Center) was developed over part of what was once the Los Angeles City Oil Field and required extensive monitoring and mitigation for hydrogen sulfide from gas migration.<sup>45</sup>

The Oil and Gas Strike Team reported hydrogen sulfide levels are absent or low at the 15 facilities in unincorporated Los Angeles County, based on available data; and no odor complaints were reported for those facilities in SCAQMD’s database.<sup>8</sup> The presence of hydrogen sulfide seems to vary depending on specific oil field conditions, and more environmental data are needed to characterize the extent of hydrogen sulfide in the Los Angeles Basin. Depending on the type of operations and proximity of people nearby, some EIRs and HIAs reviewed for this report concluded that odor events would lead to significant and unavoidable impacts to residents living nearby while others provided evidence that odor mitigation plans would alleviate odor impacts for nearby residents.

## Noise

There are a number of activities associated with oil and gas that can increase noise levels. The Los Angeles County Code (Section 12.08.390) exempts oil and gas operations from exterior noise standards during routine maintenance work and drilling activities. The primary sources of noise evaluated in the seven EIRs were construction machinery and drilling operations. Specifically, workover of oil and gas wells and well pump operation could elevate noise levels above exterior noise standards. Additionally, health impacts from noise can result from exposure to pure tones and low frequency noise sources.<sup>§</sup>

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<sup>§</sup> Pure tones result when a flare burns residual gas into the atmosphere, or when metal-to-metal contact occurs in oil equipment. Low-frequency noise is associated with power-generating plants. Processes within odorization plants can induce pure tones.

An extensive noise study conducted by Kern County estimated setback distances based on noise of 1,550 feet during well advance and 930 feet during well workover activities.<sup>46</sup> The majority of the EIRs found noise to be a significant impact that could be effectively mitigated. Furthermore, projects subject to the Los Angeles County zoning ordinance and permitted by the Department of Regional Planning with noise impacts are required to be mitigated.

### **Vibration**

Along with noise, drilling operations may increase vibration for nearby residents. Various equipment used in oil and gas drilling operations have established vibration levels, which inform the EIRs and HIAs that have been conducted. While some EIRs reported less than significant impacts from vibrations, vibrations associated with certain oil and gas operations can have significant environmental and structural impacts.

### **Hazardous Materials**

Chemicals are routinely used as part of oil and gas operations for a variety of processes, including corrosion control, wellbore cleanouts, repairs, and cementing of well casing. Hazardous chemicals may be added to drilling fluids and drilling muds, and used for enhanced oil recovery (e.g. hydraulic fracturing) as well as routine well maintenance activities (e.g. maintenance acidizing, gravel packing, and well drilling). In a comprehensive assessment of the SCAQMD database of chemicals used for routine oil and gas activities and those used for well stimulation in the Southern California, Stringfellow et al. inventoried the most frequently used chemicals – solvents, petroleum products, salts and strong acids.<sup>10</sup> Notably, hydrochloric acid and hydrofluoric acid (with concentrations of 0-15% and 0-3%, respectively) were used extensively in large quantities for routine activities such as acid cleaning for well maintenance. For each routine maintenance activity, the average mass of hydrochloric acid and hydrofluoric acid used was 1,791 and 161 kg, respectively. Stringfellow et al. concluded that there is substantial overlap between chemicals used for routine oil and gas activities and those used in hydraulic fracturing in the Southern California.

In the event of an accidental release, some of these chemicals used for routine maintenance activities could cause immediate environmental and health impacts. For example, acute symptoms of exposure to strong acids include irritation to the eyes, skin, nose and throat; pulmonary edema; eye and skin burns; rhinitis; and bronchitis. There is a lack of hazard information on the utilization of many chemicals in oil and gas operations, thus preventing emergency personnel and regulatory agencies from understanding the full scope of potential health and safety risks. The toxicity of known chemicals, combined with the gaps in health information on other chemicals, underscores the importance of robust emergency management plans to prepare for or prevent significant casualties if a large-scale incident were to occur.

## **Oil and Gas Seepage**

Oil and gas seepage has the potential to impact many environmental concerns, including subsidence, seismic activity, releases and explosions, and aquifer contamination. Continued production and leaking oil wells can result in near-surface gas accumulation, which may pose an explosive hazard. Oil and gas seepages have been documented across Los Angeles City, including the Fairfax area, south La Brea, Playa del Rey, Santa Fe Springs, and Echo Park. In 1985, an explosion in the Fairfax area demolished a Ross department store as a result of subsurface gas accumulation. One report links the gas accumulation to a nearby oil well;<sup>45</sup> however, there is still debate as to the root cause of the explosion.

Poor well completion and/or abandonment procedures can result in oil and gas leaks that negatively impact air quality in residential neighborhoods (see DPH neighborhood health investigation in Section IV). A comprehensive study of 41,000 conventional and unconventional oil and gas wells in Pennsylvania raises the issue of compromised structural integrity of well casing and cement as one mechanism likely leading to gas migration into the air (i.e. fugitive emissions) or underground drinking water sources (i.e. aquifer contamination).<sup>47</sup>

## **Summary**

Many of the EIRs and HIAs for oil and gas development projects predicted significant impacts from air emissions, odors, noise, vibration and safety hazards; and provided site-specific mitigation measures to try to reduce or eliminate those impacts. In particular, effective mitigation measures were designed to substantially reduce or eliminate impacts from air emissions and noise. Depending on operational and environmental conditions, odor impacts from routine operations and/or emergency events may not be possible to mitigate with currently available measures. Community Safety Plans and enhanced Emergency Response Plans should be developed to address the significant possible safety hazards associated with oil and gas activities and to prepare for leaks, seepage and other potential disasters. Alongside preparedness plans and mitigation measures, environmental monitoring that is both comprehensive and continuous will allow operators and regulatory agencies to develop evidence-based strategies to protect public health.

## **IV. Neighborhood Health Investigations**

### **A. AllenCo Energy Facility**

On October 18, 2013, the SCAQMD asked DPH to assess whether conditions at the AllenCo Energy Facility (AllenCo), located at 814 W. 23rd Street in the City of Los Angeles, were adversely affecting the health of nearby residents in the University Park Community of South Los Angeles.

According to regulatory records, the AllenCo facility appeared to have operated in “general compliance” with permit conditions; however, a comprehensive EIR or HIA was not required to establish permit conditions. Odor and health complaints from the public persisted over several years. Health complaints included headaches, nausea, as well as symptoms associated with irritation to the eyes, nose, throat and airways. Symptoms were recurrent and seemed to arise in conjunction with odor complaints.

The AllenCo facility consisted of seven operational oil production wells at 814 W. 23rd Street, with an additional 14 wells at several other nearby locations. An active well at the facility is located 60 feet from multi-unit housing in the adjacent community, and its property shares borders with a local high school and a college dormitory.

The AllenCo facility was in “general compliance,” meaning that it complied with the terms of the regulating agencies and the petroleum-based compounds emitted at the facility appeared to be well below levels that would lead to long-term systemic health effects. However, intermittent exposure to low level emissions can cause recurrent short-term health effects with symptoms consistent with those reported by neighboring residents.

### **Conclusion**

The DPH neighborhood health investigation concluded that the emissions from the AllenCo oil operations at the facility were associated with the reported health effects by community members and that conditions were unlikely to resolve without the company modifying or curtailing facility operations. Recommendations were made to the regulatory agencies regarding a facility-wide audit to identify sources of equipment and process-related emissions within the facility. One further recommendation was that regulatory agencies should continue to explore opportunities to further mitigate emissions using the best available technology when feasible at oil production facilities situated in urban areas with the goal of minimizing odor emissions.

A study of households near AllenCo found that many residents were not aware of their proximity to the oil production site (45.8%) and the majority would not know how to report a complaint to SCAQMD or other agency (78.5%).<sup>48</sup> Given the lack of awareness and the duration of odor complaints, protocols to improve interagency coordination and data sharing are needed to promptly identify potential issues and address community concerns.

## **B. Firmin Street**

On July 15, 2016, the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) in cooperation with the City of Los Angeles, began working to permanently plug and abandon two orphan wells located at 323 and 324 Firmin Street, in the neighborhood of Echo Park, Los Angeles. Both orphan wells were located in the front yards of residential properties. The permanent plugging and abandonment process required operation of large, industrial stationary equipment (e.g. workover rigs and cement pumps) as well as mobile equipment (e.g. power rigs and heavy trucks) within feet of residential homes.

On July 30, 2016, the City of Los Angeles referred to DPH a resident who was experiencing acute symptoms during the plugging and abandonment operations at the two orphan wells. The resident identified concerns regarding “rotten egg” and strong petroleum odors, as well as the appearance of black soot-like dust inside her home and on her property during well plugging activities. DPH officials conducted a neighborhood health investigation to observe plugging operations at the orphan wells, to document environmental conditions, and to conduct interviews with nearby residents.

During the DPH investigation, health and safety hazards (e.g. particulate matter and noise from well workover activities) were observed in proximity to at least seven households, including the complainant. Residents included young children and elderly people, as well as a high school located two blocks away. The majority of households that reported symptoms to DPH had pre-existing chronic health conditions. Additionally, residents reported that “rotten egg” odors had been intermittent in their neighborhood for many years.

DPH was advised that outdoor air was monitored by the SCAQMD, which reported that levels of methane and hydrogen sulfide did not pose a health threat. However, noise, odor, dust, and diesel emissions associated with the permanent plugging and abandonment procedures taking place in proximity to homes did pose risks to the community, including safety hazards, as well as short-term and long-term health effects.

### **Short-term Health Impacts**

During DPH’s neighborhood health investigation, all seven interviewed households reported short-term health symptoms that began when work started to permanently plug and abandon the two orphan wells on Firmin Street. In some cases, residents reported that their medical providers prescribed new medication as a result of worsened respiratory conditions. The most common symptoms included headaches, nausea, vomiting, eye and throat irritation, skin rashes, and exacerbation of pre-existing respiratory conditions such as asthma. These complaints are consistent with exposure to strong petroleum odors, increased levels of airborne particulate matter, or direct contact with crude oil.

Additionally, DPH heard loud rig drilling noise at the front porches of nearby residential properties. Conversations were inaudible at times during resident interviews. Some residents



reported extended work hours on the orphan wells, such as beginning at 6:30am or ending at 9:00pm without prior public notification, or working on weekends. One resident who worked night shifts had difficulty sleeping during the day.

### **Long-term Health Risks**

During the neighborhood health investigation of the two orphan wells, DPH also identified the presence of a third well (Patel 2) located at 314 Firmin Street in the backyard of two residential properties that was considered idle, meaning that it is not currently being used for oil production but it has yet to be determined if the operator will reactivate it or if it needs to be permanently plugged and abandoned. DOGGR issued a notice of violation to the operator of Patel 2 on June 21, 2016 for eight violations, including lack of proper signage, unremediated spills and leaks, and lack of fencing and floor grating to prevent trip and fall safety hazards to people and animals.

The noncompliant Patel 2 idle well poses an ongoing source of direct exposure to petroleum, particularly to children or pets who may inadvertently come into contact with it and also presents long-term health risks to residents from fugitive emissions, such as increased risk of nervous system problems and reproductive system effects. Unfortunately, the violations DOGGR made to the operator for Patel 2 a year prior were not enough to ensure public health and safety, and on November 4, 2017 there was another hazardous release of crude oil from a pipe connecting this well to the tank farm.<sup>49</sup>

### **Conclusion**

DPH concluded that exposure to dust, odor, noise, and vehicle exhaust emissions from the permanent plugging and abandonment of orphan wells led to significant symptoms in some residents, and these symptoms persisted until the operations were complete. In order to protect public health, DPH recommended implementing additional safety measures and offering temporary relocation assistance to affected residents in the area. Based on DPH recommendations, DOGGR provided timely and regular project updates to the residents through face-to-face communications in order to disseminate pertinent information such as project timelines, health resources, and planned changes to resident access.

## **V. Consultations with Other Jurisdictions**

In California, DOGGR has jurisdiction over subsurface oil and gas activities, including drilling, operation, maintenance, and abandonment of oil and gas wells. Los Angeles County officials may regulate zoning and land use to reduce impacts from surface operations on the surrounding communities. Current Los Angeles County Zoning Ordinance regulations require a Conditional Use Permit for the drilling of oil and gas wells on certain land use zones within 300 feet from sensitive land uses such as residential zones, public schools or parks.<sup>9</sup> However, the requirement does not apply to oil and gas wells operating prior to the adoption of the ordinance and it does not establish similar requirements for the development of sensitive land uses such as residences near existing oil and gas wells (Timothy Stapleton, Los Angeles County Department of Regional Planning, personal communication, November 15, 2017).

Some cities within Los Angeles County have ordinances established to regulate oil and gas drilling within their jurisdictions. For example, the City of Carson established a 750-foot setback distance after conducting a review of other setback distances and potential environmental impacts.<sup>50</sup> Within Los Angeles County, the Baldwin Hills Community Standard District was established to regulate oil and gas activities in the Inglewood Oil Field.<sup>6</sup> Wells in other parts of the county are not subject to the same level of oversight, and operate with various permit conditions and regulations depending on the project.<sup>7</sup>

In order to better understand oil and gas ordinances adopted by other jurisdictions, DPH consulted with ten jurisdictions that have established requirements, such as setback distances, in order to limit the potential negative health and safety impacts of oil and gas production. These ten jurisdictions have various setback requirements, ranging from 210 to 1,500 feet (Table 1).

**Table 1. Summary of Setback Distances for New Wells in Other Jurisdictions\*\***

State	Jurisdiction	Year Adopted	Setback Distance (feet)	Setback Target
California	City of Carson	2015	750	Housing, schools, hospitals
California	Kern County	2015	210	Housing, schools, hospitals
Colorado	State	2013	500	Housing
Maryland	State	2016	1,000	Housing, schools, faith institutions
			2,000	Private drinking water well
New Mexico	Santa Fe County	2008	750	Housing, schools
			1,000	Groundwater and surface water resources
Oklahoma	Oklahoma City	2015	300	Housing, fresh water well
			600	Faith institutions
Texas	City of Arlington	2011	200	Fresh water well
			600	Housing, schools, faith institutions, hospitals
Texas	City of Dallas	2013	1,500	Housing, schools, faith institutions
Texas	City of Flower Mound	2011	1,500	Housing, schools, faith institutions, hospitals, existing water wells
Texas	City of Fort Worth	2010	200	Fresh water well
			600	Housing, schools, faith institutions, hospitals

\*\* The setback distances are for protected or sensitive land use areas defined as: housing, schools, faith institutions, hospitals, and water wells (and other sources of water). Other jurisdictions not included in the table may have differing setback distances (e.g. Huntington Beach, Long Beach, and Signal Hill have setback distances of 300 feet).

When DPH asked each jurisdiction about the supporting rationale and available evidence for each of the setback distances, there were two key themes:

- Flammability and other safety concerns (e.g. explosions) related to minimum distance between industrial operations and structures, based on Fire Code.
- Air quality impacts, with supporting data from both direct measurements and modeled estimates. In a few cases, jurisdictions have established extensive monitoring networks to estimate and enforce the air emissions released by oil and gas activities (Fort Worth and Flower Mound, Texas).

When further asked about the approach used to develop the setback distances, jurisdictions responded with a wide variety of different processes. Some jurisdictions formed a task force with academic researchers, oil industry representatives and other independent experts, while others focused on community-based participatory processes to reach a consensus. Jurisdictions sometimes took a systematic research-based approach by conducting lengthy and comprehensive assessments, looked to other jurisdictions for guidance, or chose distances reflecting information gaps on chemicals utilized, air and fugitive emissions, and impacts to public health for oil and gas sites within their purview.

Two published review studies of setback distances for oil and gas activities suggest that setback distances alone may not be enough to protect public health from unconventional oil and gas operations (e.g. hydraulic fracturing). One study surveyed expert scientists, public health professionals and medical professionals regarding setback distances, and found that 89% of participants agreed that a minimum safe distance to unconventional oil and gas operations was a quarter of a mile (1,320 feet).<sup>51</sup> Another study reviewed whether setback distances from hydraulic fracturing ranging from 150 to 1,500 feet are protective from air pollution, blowouts or other safety risks and concluded that a combination of a reasonable setback distance with mitigation process controls is the best method for reducing the potential threats to public health.<sup>52</sup>

The setback distances adopted by various jurisdictions apply to future development of oil and gas sites such as drilling new wells or through land use permitting processes. The setback requirements typically do not apply to existing oil and gas wells that are operating prior to the adoption of the ordinance. Some jurisdictions have additionally established requirements for mitigation measures when operations are less than the specified distance in order to reduce public health and safety risks. For example, Kern County's ordinance requires mitigation to reduce potential noise impacts from certain oil and gas activities. After conducting an extensive noise study in an environmental impact report, Kern County found that noise impacts from certain operational activities were significant unless mitigated (e.g. 1,550 feet for well advancement, 930 feet for well workovers).<sup>46</sup> Another example is the City of Carson's Oil and Gas Ordinance that requires mitigation to reduce noise impacts from facilities within 1,000 feet of

sensitive land use zones, and requires an odor minimization plan for facilities within 1,500 feet of sensitive land use zones.<sup>50</sup>

Setback distances combined with appropriate mitigation measures can reduce many of the public health and safety risks associated with oil and gas operations for new and existing oil and gas operations in proximity to sensitive populations. An assessment of each oil and gas facility is necessary to identify current distances from existing operations to sensitive land uses and whether current mitigation measures sufficiently address the potential safety and environmental hazards and are protective of public health. Expanded monitoring of oil and gas operations will enable prudent guidance for reducing the health and safety risks from toxic air emissions, gas migration, subsidence, soil and groundwater contamination, and aging infrastructure. In addition, zoning requirements should restrict future development of sensitive land uses close to existing oil and gas operations in order to further protect public health.

## VI. Conclusion

Overall, epidemiological studies have found limited associations between certain kinds of adverse health effects and living near oil and gas operations; however, quality exposure data to accurately assess risk is lacking. The vast majority of studies have not assessed people's exposure over long periods of time and highlight the need for future research to include studies with large sample sizes and more precise measurement of an individual's exposure to a myriad of chemicals that have potential to adversely affect health. The epidemiological literature is unable to conclude at this time whether or not living, working, or going to school near oil and gas facilities is associated with long-term negative health impacts.

In addition to epidemiological studies, this report includes evidence from EIRs and HIAs of oil and gas operations primarily in California. Such reports and assessments help fill some information gaps from available epidemiological studies. Evidence from numerous potential impact areas ranging from air pollution to catastrophic releases, compels the need for public health intervention to protect against potential negative environmental and health impacts from oil and gas operations located in densely populated urban areas. Many EIRs proposed mitigation measures to reduce potential risks and hazards. In the absence of such controls, or if the impacts are unable to be mitigated (e.g. odors), potential public health risks are likely to remain, and may be particularly heightened for vulnerable populations such as young children. Depending on land use, some environmental and site conditions may be incompatible with oil and gas operations, regardless of mitigation controls.

The oil and gas development projects described in the reviewed EIRs and HIAs have assessed environmental and health hazards, and in many cases propose mitigation measures for reducing the identified risks. However, such assessments are not required for every operating oil and gas facility and for some facilities, health and safety risks are identified only after residents' complaints gain the attention of regulators and other agencies. As observed during DPH's two neighborhood health investigations in response to health complaints from residents near oil and gas operations (refer to Section IV for more information), health effects may occur with the detection of odor emissions, even when those emissions are within regional air quality standards. Routine occurrences of odor and noise emissions from operations can lead to recurrent short-term health problems, which may negatively impact the long-term wellbeing and quality of life of nearby residents. Conventional risk assessment methodologies can be limited in their ability to address these factors and to anticipate other kinds of complex health and quality-of-life consequences. In addition, the lack of monitoring data to estimate potential exposures to such emissions from oil and gas operations creates further uncertainty regarding long-term health impacts to nearby residents.

DPH's experience with health complaints from a neighborhood health investigation involving the permanent plugging and abandonment of two orphan wells, as well as one idle well located nearby, highlighted several issues with old, abandoned wells that are found across Los Angeles County:

- Orphan wells are often improperly abandoned, or left idle, which may result in communities being impacted by hydrogen sulfide and petroleum odors.
- Workover rig equipment and related abandonment operations produce dust, odor, and noise that may lead to symptoms among people living nearby.
- Mitigation measures were successfully implemented to reduce the health and safety risks identified by DPH.
- Residents were empowered to take health protective measures through enhanced communication.

Aging oil and gas infrastructure in Los Angeles County, not only at abandoned wells, but also at active wells, pipelines, and associated infrastructure, raises an important public health concern. Regulatory agencies and operators should explore opportunities to utilize the best available technology at oil production facilities in order to prevent public health impacts.

DPH identified a number of gaps in information, highlighting the need for further monitoring and health research. Primarily, the following are needed to more completely estimate the potential health risks from oil and gas operations in Los Angeles County: 1) air monitoring data to estimate potential exposures to chemical emissions from oil and gas operations, 2) proactive odor surveillance systems to identify hydrogen sulfide releases from active, idle, and abandoned wells, and 3) toxicity testing of chemicals and chemical mixtures used in oil and gas operations. In the absence of more robust exposure and health data, it is not possible to reliably quantify potential health risks.

Based on the available scientific evidence, other local and state agencies have established setback distances ranging from 210 to 1,500 feet in order to protect public health and safety amidst oil and gas operations; these setbacks were based primarily on the potential for safety concerns and air quality impacts. In addition to setback distances, particularly in cases of existing oil and gas operations within the minimum setback, alternative measures (e.g. engineering controls, monitoring, closure) combined with monitoring are necessary to protect the health and safety of the surrounding communities.

## VII. Next Steps

The potential for adverse health effects from exposure to chemicals found at oil and gas facilities, combined with the need for more research and monitoring, warrants precautions in policy-making. The two DPH neighborhood health investigations suggest the need for immediate actions to protect health at oil and gas facilities located immediately adjacent to sensitive populations. Oil and gas facilities across the Los Angeles Basin would benefit from periodic review to assess the effectiveness of existing mitigation measures, monitoring requirements, and impacts on the surrounding community.

DPH has determined through its literature review, discussions with other jurisdictions, and neighborhood health investigations that there is sufficient evidence to provide health-based guidance in five areas – setback distances, air monitoring, preventative maintenance and testing, community safety planning, and emergency response planning. DPH will collaborate with County partners, enforcement agencies and interested stakeholders to further inform the development of health-protective policies and regulations.

The findings in this report support the recommendations set forth by the interagency Oil and Gas Strike Team.<sup>8</sup> The final report by the Oil and Gas Strike Team recommended that Los Angeles County further evaluate the following key areas:

- Removal of “by right” permitting (as required by the Board Motion)<sup>7</sup>
- Setback distances
- Well stimulation techniques (to reflect state regulations)
- Air quality and odor monitoring
- Transportation of chemicals in residential areas
- Pipeline monitoring and leak detection
- Abandonment of long idle wells
- Review of Emergency Response Plans
- Community communication

### 1) Setback Distances

Los Angeles County and local jurisdictions within the County should expand the minimum setback distance beyond 300 feet, as currently specified in local zoning code, and apply these requirements to both the siting of new wells and to the development of sensitive land uses near existing operations. It is important to note that a setback distance is not an absolute measure of health protection and additional mitigation measures must also be considered. For existing oil and gas operations, a site-specific assessment at each facility throughout the County is necessary to identify current distances to sensitive land uses and other site characteristics that can be used to inform whether further mitigation measures are warranted to reduce potential public health and safety risks.



The table below summarizes various setback distances, mitigation targets, remaining hazards and whether additional mitigation measures could further reduce potential adverse impacts (Table 2). This table is based on information compiled from scientific publications,<sup>13,37,51,52</sup> environmental impact assessments,<sup>27-33</sup> other environmental studies,<sup>10,16,20,34,35,36,46</sup> and experiences in other jurisdictions.

**Table 2. Review of Key Public Health and Safety Hazards and Setback Distance Guidance**

<b>Setback Distance</b>	<b><i>Air Quality</i></b>	<b><i>Noise</i></b>	<b><i>Odors</i></b>	<b><i>Fires, Explosions, and Other Emergencies</i></b>	<b><i>Additional Mitigation and Assessment Notes</i></b>
<b>300 feet</b>					Some health and safety impacts may still be unavoidable regardless of additional mitigation.
<b>600 feet</b>	✓				Additional mitigation and assessment would likely be needed to avoid most impacts. Odors may be unavoidable, regardless of mitigation. Air monitoring is advised.
<b>1,000 feet</b>	✓	✓			Additional mitigation and assessment may be needed to avoid noise impacts during certain operations, e.g. well advancement. Odors may be unavoidable in loss of containment events, regardless of additional mitigation.
<b>1,500 feet</b>	✓	✓	✓		Additional mitigation not likely to be needed. Some uncertainty remains due to gaps in long-term health and exposure data.

✓ Represents the distance at which the impact is likely mitigated

## **2) Air Monitoring**

In coordination with the California Air Resources Board (CARB) and the South Coast Air Quality Management District (SCAQMD), Los Angeles County should require the operators of facilities within urban areas of the County to implement continuous air monitoring systems around oil and gas operations to:

- Measure air pollutants released by oil and gas operations;
- Ensure oil and gas sites comply with environmental regulations;
- Evaluate the impact of releases from oil and gas sites on surrounding neighborhoods; and
- Monitor setbacks for these sites regularly, based on air monitoring and emerging science, and revise setback distances and/or other mitigation requirements when necessary to protect public health.

It should be noted that SCAQMD has imposed some requirements related to public notification and monitoring, but only after concerns are identified at a particular oil and gas operation, such as odor complaints. Current monitoring and enforcement activities can be sporadic, and it is difficult to understand long-term exposure risks for people living near oil and gas operations in the absence of continuous monitoring. To better characterize air quality in communities near oil and gas operations, SCAQMD completed a fenceline monitoring study (refer to Section III for more information) and CARB launched the Study of Neighborhood Air near Petroleum Sources (SNAPS); results from these efforts should be used to inform air monitoring policies.

## **3) Preventative Testing and Monitoring**

A variety of state and federal regulations require routine inspections, maintenance, testing and leak detection systems for oil and gas facilities; however, local oversight of these regulations is limited. Optimal local oversight would enhance monitoring for public health and safety risks associated with aging infrastructure, and should include a local auditing and certification process, streamlined coordination, and data sharing among agencies. A local auditing program would confirm that operators are complying with federal, state and local regulations.

## **4) Community Safety Plan**

Operators should prepare and make available to the public a comprehensive Community Safety Plan, in coordination with City and County departments, including Fire, Building and Safety, and Law Enforcement. These plans should include information on hazardous chemicals stored onsite; air emission monitoring efforts; and health-based exposure thresholds to identify the need for additional mitigation. For operations to plug wells permanently or to perform well maintenance, the responsible party should also prepare and

implement a Community Safety Plan. The Community Safety Plan should facilitate communication and input from local stakeholders, and be submitted to DPH for review and approval. The Plan should include protocols and procedures for immediate notification to the County Health Officer in the event of odor or health complaints.

## **5) Emergency Preparedness Plan**

Operators should maintain enhanced Emergency Preparedness Plans that account for proximity to sensitive land use. These plans must include communication procedures to immediately notify local government agencies of any emergencies, such as spills or other releases.

To further inform health-protective policies and regulations, DPH will collaborate with County partners, local and state enforcement agencies, and interested stakeholders. DPH recommends site-specific assessments at existing oil and gas operations near sensitive land use to determine the appropriate combination of setback distance and additional mitigation measures, as well as the extent to which these measures are sufficient to protect public health.



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## Glossary of Selected Terms

**Casing** is a metal tube used during drilling an oil well in combination with cement to sequentially stabilize recently drilled formation as well as providing strong upper foundation and isolating separate zones.

**Drilling** is to dig or bore in the earth for the purpose of exploring for, developing, or producing oil, gas, or other hydrocarbons, or for the purpose of injecting water, steam, or any other fluid or substance into the earth.

**Environmental Impact Report (EIR)** is an informational document which provides public agencies and the general public with detailed information about the effect that a proposed project is likely to have on the environment. The EIR also lists the ways in which these environmental effects might be minimized and whether there are any alternatives to such a project.

**Epidemiology** is the study of the distribution and determinants of health-related states or events in specified populations, and the application of this study to the control of health problems.

**Frack-pack** is commonly used to re-direct the flow to prevent sand from entering a well and to bypass damaged zones near a well. As opposed to hydraulic fracturing intended to open permeable fracture pathways in unconventional reservoirs to enable oil or gas production, frac-packs are employed to deal with formation damage around a production well and/or sand production into the well.

**Gravel pack** is a method of controlling sand production that involves installation of a cylindrical metal screen in a production zone of a well in with the annulus between the screen and the casing (or formation if not cased) is filled with fluid slurry containing gravel. Gravel pack pressures are kept below fracture pressures.

**Grey literature** consists of materials and research produced by organizations outside of the traditional commercial or academic publishing and distribution channels, e.g. reports, working papers, government documents, etc.

**Hazard** is any biological, chemical, mechanical, environmental, or physical stressor that is reasonably likely to cause harm or damage to humans, other organisms, the environment, and/or engineered systems in the absence of control.

**Health Risk Assessment (HRA)** is a technical study that evaluates how toxic emissions are released from a facility, how they disperse throughout the community, and the potential for those toxic pollutants to impact human health.



**Hydraulic fracturing** is a process to produce fractures in the rock formation that stimulates the flow of natural gas or oil, increasing the volumes that can be recovered. Fractures are created by pumping large quantities of fluids at high pressure down a wellbore and into the target rock formation.

**Idle** well is any that has not been used for the production of oil and gas, the production of water for the purposes of enhanced oil recovery or reservoir pressure management, or injection for a period of 24 consecutive months.

**Impact** (or consequence) is the particular harm, loss, or damage that is experienced if the risk-based scenario occurs.

**Mitigation** is ongoing and sustained action to reduce the probability of, or lessen the impact of, an adverse incident.

**Orphan** is a well, pipeline, facility or associated site which has been investigated and confirmed as not having any legally responsible and/or financially able party to deal with its abandonment and reclamation responsibilities.

**Risk** incorporates the likelihood that a given hazard plays out in a scenario that causes a particular harm, loss, or damage. In quantitative risk assessments, risk is calculated as likelihood multiplied by impact.

**Unconventional** oil and gas operations allow for drilling down, drilling horizontally, and/or fracking to allow oil and gas to be explored, developed and produced. This compares to conventional processes that use the natural pressure of the wells, or water/gas injection, and pumping or compression operations to extract oil and gas resources.

**Well** is any oil or gas well or well drilled for the discovery of oil or gas; any well on lands producing or reasonably presumed to contain oil or gas; any well drilled for the purpose of injecting fluids or gas for stimulating oil or gas recovery, repressuring or pressure maintenance of oil or gas reservoirs, or disposing of waste fluids from an oil or gas field; any well used to inject or withdraw gas from an underground storage facility; or any well drilled within or adjacent to an oil or gas pool for the purpose of obtaining water to be used in production stimulation or repressuring operations.

**Well stimulation treatment** means a treatment of a well designed to enhance oil and gas production or recovery by increasing the permeability of the formation. Examples of well stimulation treatments include hydraulic fracturing, acid fracturing, and acid matrix stimulation.

**Workover** means to perform one or more of a variety of remedial operations on a producing well to try to increase production, e.g. deepening, plugging back, pulling and resetting liners, squeeze cementing, etc.





## Appendix A – Public Health Screening Assessment

Facility:			
Issue	Checklist Code	Determinations Contributing to Higher Degree of Public Health and Safety Impact Ranking	Findings
<b>Public Health Risk</b>			
<b>High Priority Risk Items</b>			
Land Use and Zoning		Proximity to residential or other public receptor locations (multiple receptors within 300')	
Hydrogen Sulfide		High H <sub>2</sub> S levels (>500 ppm within process systems)	
Wellhead Pressures		High well head pressures (>250 psig)	
Historical Activities		High levels of drilling onsite (> 4/year) contributing to noise, traffic and accident risk	
<b>Risk Contributing Items</b>			
<b>Public Health</b>			
Sensitive Populations and children		Proximity to residential areas or other sensitive populations (e.g. schools, hospitals, senior communities, homeless)	
Socioeconomic Status and health disparities	CalEnviroscreen	Surrounding community faces socioeconomic or health disparities and challenges	
<b>Environmental</b>			
<b>General Facility Operations</b>			
History		Older facilities (> 25 years)	
Gas treatment		The use of gas treatment equipment onsite	
Steam recovery		The use of steam generation onsite	
Gas pipeline pressure		High gas pipeline pressures	
<b>General/Other</b>			
PRV to atmosphere	G.2-3	Venting to atmosphere	
Flares availability	G.8	Flares not available	
<b>Noise</b>			
Sound proofing for drilling closer than 500'	N.2	No soundproofing for facilities within 500'	
Pure tones		Pure tones or low frequency	
Deliveries time limits	N.4	No time limits on deliveries	



<b>Facility:</b>			
<b>Issue</b>	<b>Checklist Code</b>	<b>Determinations Contributing to Higher Degree of Public Health and Safety Impact Ranking</b>	<b>Findings</b>
<i><b>Aesthetics/Infrastructure</b></i>			
Derricks removed, unused equipment	FI.2, FI.3, FW.4	Presence of older equipment	
Sumps: hazard to people, screening	SM.4, SM.6, SM.10, SM.11	Hazardous, no screening on top, electrical/trip fall hazards	
<i><b>Air Quality</b></i>			
Air Toxics		Part of the AQMD AB2588 program	
Monitoring systems within 1500' of residences	AQ.7	No monitoring systems	
<b>Safety</b>			
<i><b>Drilling</b></i>			
Drill sites 75' from boundary, 100' from buildings, 300' of a residence	D.2	Closer than prescribed distances	
Drill sites within 500' of a residence	D.5, N.2, N.3	Closer than 500' and not using sound proofing methods	
<i><b>Setbacks</b></i>			
Critical wells	SB.3, SB.4	Critical well and free-flowing production	
Wells 20' highway, 75' street, 100' building, 300' school, 25' of ignition sources?	SB.6, SB.7, SB.8, SB.9, SB.10	Closer than setback distances or close to powerlines due to rig height	
<i><b>Gas Pipelines</b></i>			
Inspection history	PL.1	No internal inspection history	
Alarms and shutdown	PL.5 – PL.8	No procedures or systems, manual shutdown, no 24 hr attendance	
Pipeline signs and labeling		No markings or warning signs posted along visible pipelines going through private driveways, parking spaces, other traffic roads	
<i><b>Fire</b></i>			
Sufficient clearance	F.3	Poor fire preparation	
Fire water capabilities	F.4 – F.5	Inadequate fire water	
Hazardous Materials	HM.8	Transportation of highly hazardous materials through residential areas	
ERP: Drills	ER.2 - ER.3	Inadequate ERP and drills	
Security: Fencing	S.1-S.5	Inadequate fencing	



<b>Facility:</b>			
<b>Issue</b>	<b>Checklist Code</b>	<b>Determinations Contributing to Higher Degree of Public Health and Safety Impact Ranking</b>	<b>Findings</b>
<b>Documentation</b>			
AQMD 1173 reports: odors, GHG, toxics emissions		High numbers of leaking components	
AQMD Odor Complaints		Multiple odor complaints	
AQMD NOV/NTC		Multiple NOV/NTC	
Fire: annual inspection		Inspection report findings	
Public Health: complaints		Multiple complaints	
DOGGR: inspection reports		Inspection report findings	
ERP		ERP not available or inadequate	
Wells/facilities within 100' feet of waterways	SB.3	Located closer than 100' to waterways	
Could a release affect nearby creeks?	SC.5	Could affect nearby creeks	
Adequate secondary containment?	SC.2 – SC.5	Lack of secondary containment/berms	
Sufficient onsite spill cleanup and control equipment?	SP.17	Lack of onsite control equipment and personnel responsible for cleanup	
Crude/Emulsion Pipelines: Inspection	PL.1	No internal inspection history	
Crude/Emulsion Pipelines: Alarms and shutdown	PL.5 – PL.8	No procedures or systems, manual shutdown, no 24 hr attendance	
SPCC	SP.1 – SP.21	SPCC inadequate	
<b>Site Contamination Risk</b>			
Does the site history indicate the potential for site contamination?	G.12	Potential history of tank farm or other activity indicating potential for contamination	







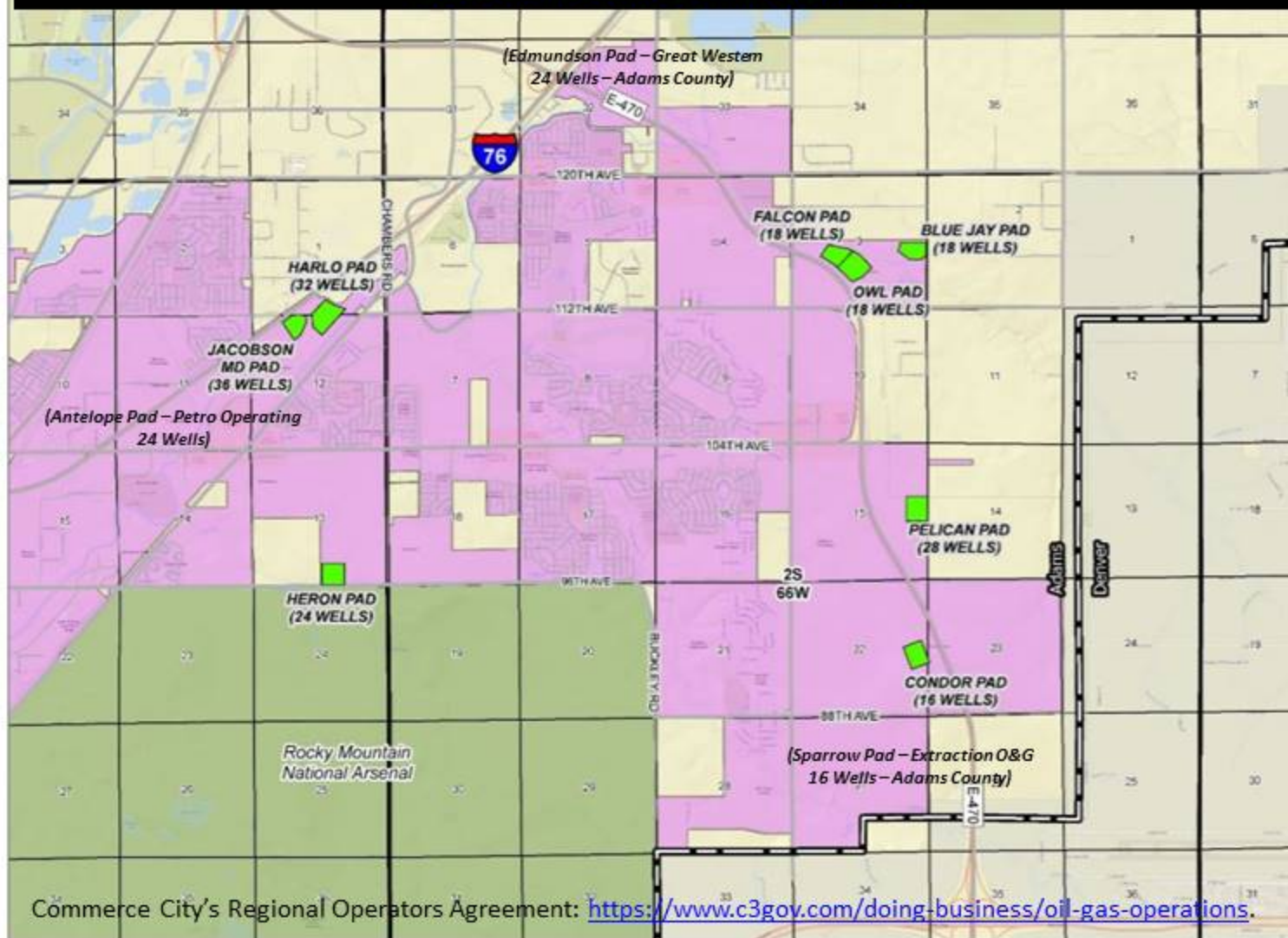
# 11 Sites and 254 Wells Total Proposed\* for Commerce City Neighborhoods

*\*Extraction O&G, 9 Sites, 206 Wells*



## Legend

- Major Road
- Local Road
- Commerce City Boundary
- County Boundary



Adams County Development Commerce City XOG pads & Units Adams County, CO	
Scale: 1" = 100'	PROJECT NUMBER:
Date: 8/1/2012	Author: JMS



Commerce City's Regional Operators Agreement: <https://www.c3gov.com/doing-business/oil-gas-operations>.

July 25, 2019

Commerce City Mayor and Council Members  
7887 E. 60<sup>th</sup> Ave.  
Commerce City, CO 80022

Adams County Communities for Drilling Accountability Now  
13789 Franklin St.  
Brighton, CO 80602

Dear Commerce City Mayor, City Council Members, and City Manager,

As Board Members of Adams County Communities for Drilling Accountability Now (ACCDAN), and a 501(c)(3) non-profit organization representing hundreds of Adams County residents, your drafted Regional Operator Agreement (ROA) has just come to our attention. As your neighbors in unincorporated Adams County, we would like to offer our input into this untimely contract with Extraction Oil and Gas.

We are shocked at the number of oil and gas wells that will fall under this ROA, but we are primarily concerned that they do not even come close to the mandate of Colorado's new State law – SB19-181 – to prioritize public health, safety, and welfare, and the environment and wildlife resources. In fact, the ROA, as drafted, will not only fall far short of the law's purpose but will go counter to its intent to change the current proliferation of oil and gas development in urban areas. This ROA, intended to be implemented prior to your own City regulations and the Colorado Oil and Gas Conservation Commission (COGCC) rulemaking is both unethical and undermines the intent of the law!

Commerce City promises "Quality Community for a Lifetime." We found the criteria in your current ROA draft not only negates that promise, but prioritizes Extraction's oil and gas development over resident's health, safety, and welfare, and the environment and wildlife resources:

- Prioritizes new oil and gas development over existing residential development.
- Prioritizes oil and gas development by ignoring zoning ordinances, increasing potential population impact from explosions and emissions due to equipment failure, natural disasters, and human error.
- Prioritizes Extraction's potential profit over the real financial and emotional investments residents have put into their homes.
- Prioritizes Extraction's ability to determine Best Management Practices over residents, who know the community best.
- Prioritizes Extraction's right to choose less than the latest BMPs.
- Prioritizes pipeline right-of-ways to benefit Extraction at taxpayers expense.
- Prioritizes oil and gas development by denying citizens a voice in their own community development.

- Prioritizes Extraction's ability to determine a site without an alternative site analysis, critical in finding safer locations.
- Prioritizes industrial development in floodplains, superfund sites, and sensitive wildlife areas.
- Prioritizes oil and gas development over the cumulative impacts 190 wells will have on local air quality, water supplies, noise, and traffic.

As it stands, we believe your current ROA is not only wholly insufficient in meeting Colorado's new standard of prioritizing public health, safety, welfare, and the environment and wildlife resources, it continues to prioritize oil and gas development. We recommend that you do not go forward with this contract until your City regulations are put into place, and the COGCC has finished the rulemaking process. To allow 190 wells prior to new regulations is an egregious overreach by completely ignoring the health, safety, and welfare of Commerce City citizens.

Sincerely,  
Stewart and Christine Nyholm, ACCDAN

SUMMARY OF REVENUES AND EXPENSES - OIL AND GAS IMPACTS (ACTUAL 2004 - 2017; AND ESTIMATED 2018 - 2041)													
		General Funds (City and County)					All Other Governmental Funds				Sewer Utility Fund		
Tax Year	Revenue Year	Oil and Gas Revenues - General Funds	Oil and Gas Expenses - General Funds	Net Annual Revenue or (Expense) - General Funds	Cummulative Revenue or (Expense) - General Funds		Oil and Gas Revenues - All Other Governmental Funds (HHS, Library, Streets, CIP)	Expenses to support operations and programs - All Other Governmental Funds (HHS, Library, Streets, CIP)	Net Annual Revenue or (Expense) - All Other Governmental Funds		Sewer Fund - Royalties and Easements (from Biosolids Farm property owned by the Sewer Enterprise)	Sewer Fund Operating Expenses supported through this revenue source	Net Annual Revenue or (Expense) - All Other General Governmental Funds
2003	2004	38,539	-	38,539	38,539		22,204	22,204	-		29,550	29,550	-
2004	2005	58,120	-	58,120	96,659		33,291	33,291	-		36,358	36,358	-
2005	2006	97,004	-	97,004	193,663		47,680	47,680	-		38,548	38,548	-
2006	2007	129,373	-	129,373	323,036		73,305	73,305	-		72,216	72,216	-
2007	2008	107,047	-	107,047	430,083		61,923	61,923	-		110,440	110,440	-
2008	2009	81,720	-	81,720	511,803		47,273	47,273	-		56,150	56,150	-
2009	2010	134,085	-	134,085	645,888		77,563	77,563	-		91,336	91,336	-
2010	2011	116,709	-	116,709	762,597		67,512	67,512	-		70,784	70,784	-
2011	2012	185,148	-	185,148	947,745		107,102	107,102	-		86,735	86,735	-
2012	2013	481,994	-	481,994	1,429,739		237,598	237,598	-		93,902	93,902	-
2013	2014	393,852	-	393,852	1,823,591		187,301	187,301	-		44,165	44,165	-
2014	2015	378,648	-	378,648	2,202,239		144,150	144,150	-		111,522	111,522	-
2015	2016	213,884	94,088	119,796	2,322,035		107,408	107,408	-		164,869	164,869	-
2016	2017	76,098	669,553	(593,455)	1,728,580		34,357	34,357	-		666,762	666,762	-
2017	2018	144,011	1,310,218	(1,166,207)	562,373		42,813	42,813	-		750,000	750,000	-
2018	2019	145,243	1,834,122	(1,688,879)	(1,126,506)		43,526	43,526	-		150,000	150,000	-
2019	2020	147,078	1,425,585	(1,278,507)	(2,405,013)		44,588	44,588	-		150,000	150,000	-
2020	2021	2,823,969	1,438,305	1,385,664	(1,019,349)		1,575,722	1,575,722	-		150,000	150,000	-
2021	2022	4,756,500	951,406	3,805,094	2,785,746		2,693,625	2,693,625	-		150,000	150,000	-
2022	2023	3,896,619	964,900	2,931,719	5,717,465		2,196,213	2,196,213	-		150,000	150,000	-
2023	2024	2,057,155	978,799	1,078,356	6,795,821		1,132,146	1,132,146	-		150,000	150,000	-
2024	2025	1,442,579	893,115	549,464	7,345,285		776,635	776,635	-		150,000	150,000	-
2025	2026	1,075,196	907,860	167,336	7,512,620		581,471	581,471	-		150,000	150,000	-
2026	2027	841,387	923,048	(81,661)	7,430,959		446,220	446,220	-		150,000	150,000	-
2027	2028	673,581	968,692	(295,111)	7,135,849		360,719	360,719	-		150,000	150,000	-
2028	2029	566,097	954,804	(388,707)	6,747,141		298,544	298,544	-		150,000	150,000	-
2029	2030	484,460	971,400	(486,940)	6,260,201		251,321	251,321	-		150,000	150,000	-
2030	2031	421,693	988,495	(566,802)	5,693,399		215,011	215,011	-		150,000	150,000	-
2031	2032	370,720	1,006,101	(635,381)	5,058,018		185,524	185,524	-		150,000	150,000	-
2032	2033	326,945	1,024,236	(697,291)	4,360,726		160,203	160,203	-		150,000	150,000	-
2033	2034	288,882	1,042,915	(754,033)	3,606,693		138,184	138,184	-		150,000	150,000	-
2034	2035	255,770	1,062,155	(806,385)	2,800,308		119,032	119,032	-		150,000	150,000	-
2035	2036	206,964	1,081,972	(875,008)	1,925,300		102,368	102,368	-		150,000	150,000	-
2036	2037	185,907	1,102,383	(916,476)	1,008,825		90,187	90,187	-		150,000	150,000	-
2037	2038	154,426	1,153,406	(998,980)	9,845		71,977	71,977	-		150,000	150,000	-
2038	2039	145,002	1,145,060	(1,000,058)	(990,214)		66,525	66,525	-		150,000	150,000	-
2039	2040	139,008	1,167,364	(1,028,356)	(2,018,570)		63,056	63,056	-		150,000	150,000	-
2040	2041	133,612	1,190,337	(1,056,725)	(3,075,295)		59,936	59,936	-		150,000	150,000	-
Total		24,175,025	27,250,320	(3,075,295)			12,964,213	12,964,213			5,873,337	5,873,337	

HHS (DDMH)	4,249,760
Library	2,370,345
Streets	848,731
CIP - Facilities Reserve	1,221,197
CIP - Project Support	4,274,180
Total	12,964,213

Revenues collected in the Sewer Fund offset costs to provide sewer services to customers, keeping rates more reasonable.



**OIL AND GAS - REVENUES (ACTUAL: 2004 - 2017; AND ESTIMATED 2018 - 2041)**

Tax Year	Revenue Year	Estimated Assessed Values - Oil & Gas Property	Total Property Tax		City General Fund - Severance Tax	City General Fund Property Tax	County General Fund Property Tax	Subtotal All General Funds	HHS Fund (DDMH) Property Tax	Library Fund Property Tax	Streets Fund Property Tax	CIP - County Facilities Reserve Property Tax	CIP Fund Property Tax	Sewer Fund - Royalties and Easements	All Other Funds
		<i>Mills</i>	<i>28.968</i>		---	<i>5.321</i>	<i>13.031</i>	<i>18.352</i>	<i>3.480</i>	<i>1.941</i>	<i>0.695</i>	<i>1.000</i>	<i>3.500</i>	---	<i>10.616</i>
2003	2004	2,091,590	60,589		154	11,129	27,256	38,539	7,279	4,060	1,454	2,092	7,319	29,550	51,754
2004	2005	3,135,860	90,840		571	16,686	40,863	58,120	10,913	6,087	2,179	3,136	10,976	36,358	69,649
2005	2006	4,491,250	130,103		14,581	23,898	58,525	97,004	15,630	8,718	3,121	4,491	15,720	38,548	86,228
2006	2007	6,905,210	200,030		2,648	36,743	89,982	129,373	24,030	13,403	4,799	6,905	24,168	72,216	145,521
2007	2008	5,832,990	168,970		-	31,037	76,010	107,047	20,299	11,322	4,054	5,833	20,415	110,440	172,363
2008	2009	4,452,940	128,993		-	23,694	58,026	81,720	15,496	8,643	3,095	4,453	15,586	56,150	103,423
2009	2010	7,306,270	211,648		-	38,877	95,208	134,085	25,426	14,181	5,078	7,306	25,572	91,336	168,899
2010	2011	6,359,460	184,221		-	33,839	82,870	116,709	22,131	12,344	4,420	6,359	22,258	70,784	138,296
2011	2012	10,088,730	292,250		-	53,682	131,466	185,148	35,109	19,582	7,012	10,089	35,310	86,735	193,837
2012	2013	22,381,120	648,336		71,256	119,090	291,648	481,994	77,886	43,442	15,555	22,381	78,334	93,902	331,500
2013	2014	17,643,260	511,090		70,063	93,880	229,909	393,852	61,399	34,246	12,262	17,643	61,751	44,165	231,466
2014	2015	13,578,500	393,342		129,456	72,251	176,941	378,648	47,253	26,356	9,437	13,579	47,525	111,522	255,672
2015	2016	10,117,520	293,084		28,208	53,835	131,841	213,884	35,209	19,638	7,032	10,118	35,411	164,869	272,277
2016	2017	3,236,280	93,749		16,706	17,220	42,172	76,098	11,262	6,282	2,249	3,236	11,328	666,762	701,119
2017	2018	4,032,880	116,824		70,000	21,459	52,552	144,011	14,034	7,828	2,803	4,033	14,115	750,000	792,813
2018	2019	4,100,000	118,769		70,000	21,816	53,427	145,243	14,268	7,958	2,850	4,100	14,350	150,000	193,526
2019	2020	4,200,000	121,666		70,000	22,348	54,730	147,078	14,616	8,152	2,919	4,200	14,701	150,000	194,588
2020	2021	148,428,997	4,299,691		100,000	789,791	1,934,178	2,823,969	516,533	288,101	103,158	148,429	519,501	150,000	1,725,722
2021	2022	253,732,559	7,350,125		100,000	1,350,111	3,306,389	4,756,500	882,989	492,495	176,344	253,733	888,064	150,000	2,843,625
2022	2023	206,877,672	5,992,832		100,000	1,100,796	2,695,823	3,896,619	719,934	401,550	143,780	206,878	724,071	150,000	2,346,213
2023	2024	106,645,286	3,089,301		100,000	567,460	1,389,695	2,057,155	371,126	206,999	74,118	106,645	373,258	150,000	1,282,146
2024	2025	73,157,073	2,119,214		100,000	389,269	953,310	1,442,579	254,587	141,998	50,844	73,157	256,049	150,000	926,635
2025	2026	54,773,080	1,586,667		70,000	291,448	713,748	1,075,196	190,610	106,315	38,067	54,773	191,706	150,000	731,471
2026	2027	42,032,816	1,217,607		70,000	223,657	547,730	841,387	146,274	81,586	29,213	42,033	147,114	150,000	596,220
2027	2028	33,978,878	984,300		50,000	180,802	442,779	673,581	118,246	65,953	23,615	33,979	118,926	150,000	510,719
2028	2029	28,122,093	814,641		50,000	149,638	366,459	566,097	97,865	54,585	19,545	28,122	98,427	150,000	448,544
2029	2030	23,673,727	685,781		50,000	125,968	308,492	484,460	82,385	45,951	16,453	23,674	82,858	150,000	401,321
2030	2031	20,253,534	586,704		50,000	107,769	263,924	421,693	70,482	39,312	14,076	20,254	70,887	150,000	365,011
2031	2032	17,475,989	506,244		50,000	92,990	227,730	370,720	60,816	33,921	12,146	17,476	61,165	150,000	335,524
2032	2033	15,090,732	437,148		50,000	80,298	196,647	326,945	52,516	29,291	10,488	15,091	52,817	150,000	310,203
2033	2034	13,016,641	377,066		50,000	69,262	169,620	288,882	45,298	25,265	9,047	13,017	45,557	150,000	288,184
2034	2035	11,212,449	324,802		50,000	59,661	146,109	255,770	39,019	21,763	7,793	11,212	39,245	150,000	269,032
2035	2036	9,642,771	279,332		30,000	51,309	125,655	206,964	33,557	18,717	6,702	9,643	33,749	150,000	252,368
2036	2037	8,495,387	246,094		30,000	45,204	110,703	185,907	29,564	16,490	5,904	8,495	29,734	150,000	240,187
2037	2038	6,780,006	196,403		30,000	36,076	88,350	154,426	23,594	13,160	4,712	6,780	23,731	150,000	221,977
2038	2039	6,266,450	181,527		30,000	33,344	81,658	145,002	21,807	12,163	4,355	6,266	21,934	150,000	216,525
2039	2040	5,939,806	172,064		30,000	31,606	77,402	139,008	20,671	11,529	4,128	5,940	20,788	150,000	213,056
2040	2041	5,645,825	163,548		30,000	30,041	73,571	133,612	19,647	10,959	3,924	5,646	19,760	150,000	209,936
		<b>Total Revenues</b>	<b>35,375,595</b>		<b>1,763,643</b>	<b>6,497,984</b>	<b>15,913,398</b>	<b>24,175,025</b>	<b>4,249,760</b>	<b>2,370,345</b>	<b>848,731</b>	<b>1,221,197</b>	<b>4,274,180</b>	<b>5,873,337</b>	<b>18,837,550</b>

	<b>OIL AND GAS ESTIMATED EXPENSES - GENERAL FUNDS (CITY AND COUNTY) FROM 2016 - 2041</b>										
<b>Revenue Year</b>	<b>Comp Plan Task Force</b>	<b>Comp Plan Volunteer Hours</b>	<b>Outside Legal and Engineering</b>	<b>Divisional Costs (CMO and Oil &amp; Gas Inspections)</b>	<b>DOAA Costs (\$100,000 per site)</b>	<b>Air Quality Testing</b>	<b>Soil and Water Testing</b>	<b>Soil Testing on Abandoned Wells</b>	<b>Industrial Hygiene Measuring Costs (leaks)</b>	<b>Database for Inspection and Monitoring Information</b>	<b>Total Expenses</b>
<b>2016</b>			55,333	38,755							<b>94,088</b>
<b>2017</b>	178,237	100,800	228,629	161,887							<b>669,553</b>
<b>2018</b>			200,000	459,038	100,000	551,180					<b>1,310,218</b>
<b>2019</b>			240,000	461,636	100,000	630,886	200,000	96,600	5,000	100,000	<b>1,834,122</b>
<b>2020</b>				423,985	100,000	500,000	200,000	96,600	5,000	100,000	<b>1,425,585</b>
<b>2021</b>				436,705	100,000	500,000	200,000	96,600	5,000	100,000	<b>1,438,305</b>
<b>2022</b>				449,806	100,000		200,000	96,600	5,000	100,000	<b>951,406</b>
<b>2023</b>				463,300	100,000		200,000	96,600	5,000	100,000	<b>964,900</b>
<b>2024</b>				477,199	100,000		200,000	96,600	5,000	100,000	<b>978,799</b>
<b>2025</b>				491,515			200,000	96,600	5,000	100,000	<b>893,115</b>
<b>2026</b>				506,260			200,000	96,600	5,000	100,000	<b>907,860</b>
<b>2027</b>				521,448			200,000	96,600	5,000	100,000	<b>923,048</b>
<b>2028</b>				567,092			200,000	96,600	5,000	100,000	<b>968,692</b>
<b>2029</b>				553,204			200,000	96,600	5,000	100,000	<b>954,804</b>
<b>2030</b>				569,800			200,000	96,600	5,000	100,000	<b>971,400</b>
<b>2031</b>				586,895			200,000	96,600	5,000	100,000	<b>988,495</b>
<b>2032</b>				604,501			200,000	96,600	5,000	100,000	<b>1,006,101</b>
<b>2033</b>				622,636			200,000	96,600	5,000	100,000	<b>1,024,236</b>
<b>2034</b>				641,315			200,000	96,600	5,000	100,000	<b>1,042,915</b>
<b>2035</b>				660,555			200,000	96,600	5,000	100,000	<b>1,062,155</b>
<b>2036</b>				680,372			200,000	96,600	5,000	100,000	<b>1,081,972</b>
<b>2037</b>				700,783			200,000	96,600	5,000	100,000	<b>1,102,383</b>
<b>2038</b>				751,806			200,000	96,600	5,000	100,000	<b>1,153,406</b>
<b>2039</b>				743,460			200,000	96,600	5,000	100,000	<b>1,145,060</b>
<b>2040</b>				765,764			200,000	96,600	5,000	100,000	<b>1,167,364</b>
<b>2041</b>				788,737			200,000	96,600	5,000	100,000	<b>1,190,337</b>
	178,237	100,800	723,962	14,128,455	700,000	2,182,066	4,600,000	2,221,800	115,000	2,300,000	<b>27,250,320</b>

7/29/19

City of Commerce City  
City Council  
City Manager Brian McBroom  
7887 E. 60<sup>th</sup> Ave  
Commerce City, CO 80022

RE: ROA/BMP

All,

We, as a family, are writing this letter in regards to the ROA/BMP that you have proposed to the residents in this area. First off we would like to ask, what is the rush, why are you not waiting for the COGCC to set the new rules before you agree to this contract? While we understand, this Agreement took time to draft, it doesn't make sense to rush this process. All through this document the COGCC rules are referenced and they are to be adhered to, however, you are pushing this document forward without knowing what the new rules will be.

While you ask for resident input most residents will not respond. They feel that you haven't listened to them in the past and this process is a waste of time. Your residents feel that their opinions fall on deaf ears. It is sad that you have pushed away so many people.

We read the ROA/BMP and have the following concerns:

-This Agreement should not automatically continue after four years. After the four-year term, has expired, both sides should come back to the table and review how things have progressed and go from there.

-A three-million-dollar bond doesn't seem like enough money considering how many pads Extraction wants to drill. In our opinion they should pay at least one-million-dollars per drill site. Three million dollars won't even cover our infrastructure if it is damaged.

-\$500.00 for inspection fees seems very low and has a feeling that tax payers will be shouldering some of this burden. Is this for a one-time inspection or a once a year inspection? If we are only inspecting these operations once a year, that is not acceptable.

-Why would the City allow drilling within 500 feet of surface water? That is very illogical considering the amount of spills this industry creates. (Per Greeley Tribune "spill report" this is a very common problem).

-And on the topic of spills why would you want to run a pipeline through our residential areas and near our ground water? The pipeline in North Dakota is already leaking and contaminating their drinking water same with Oklahoma. There was even a spill in Weld County that contaminated ground water. South Adams is putting in a water softening system and that will be useless if we can't use our water.

-Why does the "Operator" get to run the baseline tests? Why wouldn't the City want to have an independent company do the tests and have the "Operator" pay for it. We all know test results can be swayed.

-There was mention of lighting. I would invite any of you to visit an active site at night. The lights at those sites are blinding. When they were drilling the site by the County building off of Sable you could see those lights from 120<sup>th</sup> and Riverdale. Do you really think this is a good idea in residential areas near homes of people who want to enjoy their outdoor spaces or star gaze? The light pollution from that site was offensive to drive past and was blindingly bright. I keep the Antelope Pad in the front of my mind while thinking about the noise and light impact. The people living in Turnberry and the Aberdeen developments will be negatively impacted. The new restaurants in the strip mall will also be negatively impacted. No one wants to listen or see industrial operations while trying to relax.

-30 million dollars, that is all the City possibly stands to gain. That is chump change from an industry that receives government welfare in the form of subsidies. 30 million dollars will barely pay for damaged infrastructure and will negatively impact future businesses moving to our area. It's not like Extraction is planning to drill in rural areas, oh no, they want to drill in prime real estate areas. Is the money really worth the risk of more businesses avoiding this area? If you read social media folks want more shopping, restaurants and other establishments so we can spend our money. If you take away prime real estate with drilling who is going to move their company here?

-We attended a meeting with Senator Foote last week and he advised us that this ROA will have to be submitted to the COGCC for approval. If you know the rules will be changing wouldn't you rather save face than be a mockery like Weld County? Wouldn't you rather come across as knowledgeable on 181 and submit an agreement that actually follows the rules of the COGCC?

In closing we respectfully request that you hold off on the ROA/BMP Agreement, take into consideration what your focus group suggested, re-read 181 and understand what it says (phone a friend at the State level if you have questions) and slow down. You have the authority to stand up and do the right thing. Take control of your power and do what 181 gives you the right to do. You can, oppose this, it was verified by speaking with Senator Foote.

Remember, your residents are going to be facing this like they have on other matters. If you do not do what's in the best interest of the residents in this area, we will push forward and fight this. A more detailed version of this letter will be sent to the COGCC to oppose this ROA/BMP. There are people in this area, that work in the industry, who agree this shouldn't go forward. My neighbor explained the dangers of drilling in residential areas and then moved out of Adams County. We will not sit by and watch our elected officials and appointed City employees destroy our most valuable assets.

Sincerely,

The Gudmundson/Dorris Family

7/29/19

City of Commerce City  
City Council  
City Manager Brian McBroom  
7887 E. 60<sup>th</sup> Ave  
Commerce City, CO 80022

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-Why does the "Operator" get to run the baseline tests? Why wouldn't the City want to have an independent company do the tests and have the "Operator" pay for it. We all know test results can be swayed.

-There was mention of lighting. I would invite any of you to visit an active site at night. The lights at those sites are blinding. When they were drilling the site by the County building off of Sable you could see those lights from 120<sup>th</sup> and Riverdale. Do you really think this is a good idea in residential areas near homes of people who want to enjoy their outdoor spaces or star gaze? The light pollution from that site was offensive to drive past and was blindingly bright. I keep the Antelope Pad in the front of my mind while thinking about the noise and light impact. The people living in Turnberry and the Aberdeen developments will be negatively impacted. The new restaurants in the strip mall will also be negatively impacted. No one wants to listen or see industrial operations while trying to relax.

-30 million dollars, that is all the City possibly stands to gain. That is chump change from an industry that receives government welfare in the form of subsidies. 30 million dollars will barely pay for damaged infrastructure and will negatively impact future businesses moving to our area. It's not like Extraction is planning to drill in rural areas, oh no, they want to drill in prime real estate areas. Is the money really worth the risk of more businesses avoiding this area? If you read social media folks want more shopping, restaurants and other establishments so we can spend our money. If you take away prime real estate with drilling who is going to move their company here?

-We attended a meeting with Senator Foote last week and he advised us that this ROA will have to be submitted to the COGCC for approval. If you know the rules will be changing wouldn't you rather save face than be a mockery like Weld County? Wouldn't you rather come across as knowledgeable on 181 and submit an agreement that actually follows the rules of the COGCC?

In closing we respectfully request that you hold off on the ROA/BMP Agreement, take into consideration what your focus group suggested, re-read 181 and understand what it says (phone a friend at the State level if you have questions) and slow down. You have the authority to stand up and do the right thing. Take control of your power and do what 181 gives you the right to do. You can, oppose this, it was verified by speaking with Senator Foote.

Remember, your residents are going to be facing this like they have on other matters. If you do not do what's in the best interest of the residents in this area, we will push forward and fight this. A more detailed version of this letter will be sent to the COGCC to oppose this ROA/BMP. There are people in this area, that work in the industry, who agree this shouldn't go forward. My neighbor explained the dangers of drilling in residential areas and then moved out of Adams County. We will not sit by and watch our elected officials and appointed City employees destroy our most valuable assets.

Sincerely,

The Gudmundson/Dorris Family



SINCE 1904

# FULENWIDER

HISTORY      LAND      PEOPLE      VISION

July 17, 2019

The Honorable Sean Ford  
Mayor  
City of Commerce City  
7887 E 60<sup>th</sup> Ave  
Commerce City, CO 80022  
sford@c3gov.com

Mr. Brian McBroom  
City Manager  
City of Commerce City  
7887 E 60<sup>th</sup> Ave  
Commerce City, CO 80022  
bmcbroom@c3gov.com

Dear Mayor Ford and Mr. McBroom,

We are writing to express L.C. Fulenwider, Inc.'s enthusiastic support for Extraction Oil & Gas' proposed Operator Agreement with Commerce City.

Fulenwider has owned property and mineral rights in Commerce City since the early 1900s, decades before the city's incorporation. As the landowners of Reunion, the 3,240-acre master planned community, we are deeply invested in protecting the city's character, quality of life and environmental health. We have elected to partner with Extraction Oil & Gas to develop our mineral resources because they share our commitment to careful, long-term land stewardship.

Extraction has established itself as an industry leader in public safety and environmental protection. Their operations will be screened from view and measures will be implemented to protect air quality, conserve water, reduce traffic and minimize noise pollution.

With approval of the Operator Agreement, Extraction will generate more than \$350 million in tax revenue. Commerce City will receive \$34 million in new tax revenue. School districts serving Commerce City will receive \$137 million in additional tax revenue.

Fulenwider respects Commerce City's commitment to retain local control over oil and gas development within city limits. The high standards set in Extraction's Operator Agreement exceed the rigorous protections set by the State Legislature this year in Senate Bill 181. We trust Extraction to fulfill all obligations included in the agreement.

We ask that you approve the Extraction Oil & Gas Operator Agreement. This agreement will allow us to fulfil our promise to carefully steward and responsibly develop our Commerce City property. In addition, the revenue generated by this development will have a positive and lasting impact for our schools and community. Thank you for considering our comments.

Sincerely,



Rick Wells  
Senior Vice President



Blake Fulenwider  
Vice President

## **Martinelli, Domenic - CD**

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**From:** McBroom, Brian - CM  
**Sent:** Wednesday, July 31, 2019 4:10 PM  
**To:** Timms, Steve - CD; Martinelli, Domenic - CD; Sheesley, Robert - CA  
**Subject:** FW: Please consider

**From:** Aden Roucloux <aden.roucloux@gmail.com>  
**Sent:** Tuesday, July 23, 2019 8:52 PM  
**To:** Huseman, Benjamin - CC <bhuseman@c3gov.com>; Ford, Sean - CC <sford@c3gov.com>; Teter, Rick - CC <rteter@c3gov.com>; Madera, Oscar - CC <omadera@c3gov.com>; Frank, Nicole - CC <nfrank@c3gov.com>; Davis, Steve - CC <stdavis@c3gov.com>; Douglas, Steven - CC <sdouglas@c3gov.com>; Elliott, Crystal - CC <celliott@c3gov.com>; Guardiola, Jose - CC <jguardiola@c3gov.com>; Cramer, Chris - CD <ccramer@c3gov.com>; City Council <CityCouncil@c3gov.com>; council@c3gov.com  
**Subject:** Please consider

Dear council,

In your deliberations, I beg of you to please consider the residents' feelings regarding oil and gas in our community. SB 181 gives local gov a say and the ability to deny permits. You no longer have to be rubber stamp for the state.

Please consider that Extraction Oil and Gas has a plummeting stock price. What happens when we have an inevitable drop in the oil market? The city will be left with the bill and the mess. This is not a sure business deal.

After speaking with experts, I do not believe the ROA is adequate. It falls short in the following areas:

- Putting first the public health, safety, and welfare of the people. 30k resident homes will be fracked under. The water is already subpar, now it could be impacted by an inevitable accident.
- Allowing oil and gas production in close proximity to marginalized citizens who don't always have the infrastructure to speak up for themselves or the money to move elsewhere. The proposed Heron Pad is right next to a future lower-income oakwood homes neighborhood for first responders, teachers and military. This is not the first time we have seen this. Suncor is in the middle of a predominantly Hispanic area of the city. It is surrounded by schools, and is negatively impacting them, as we see in their performance. According to National Jewish Health, the leading respiratory hospital in the nation, pollution and chemicals cause major health problems in kids and adults, which leads to lower performance in school and work. The Pelican pad will be near a school, and all pads are uncomfortably close to buildings and/or homes. If we put these wells across our city, we are effectively limiting the success of our residents.

The ROA also falls short in these areas:

- Examination of cumulative impacts of 254 new wells. Please look at the wells in total, not just by individual permits. In just one example, the Harlo and Jacobson pads are close together and near homes.
- Minimizing the adverse impacts of fracking
- Testing soil, water, crops and livestock in the area...even if citizens don't live close by. We do eat the crops and livestock that could be impacted negatively.

-Considering the impacts of the arsenal. The Heron Pad will be right next arsenal which is already a precarious area. Condor pad is close. What happens if there is an accident?  
Nothing is keeping arsenal contaminates within arsenal borders.

Ultimately, Industrial operations and neighborhoods dont mix. Please reconsider the ROA and the feelings of residents.

Thank you,  
Aden Roucloux



## WESTSIDE INVESTMENT PARTNERS, INC.

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4100 East Mississippi Ave, Ste 500 Denver, CO 80246 p 303.984.9800

July 26, 2019

Commerce City Mayor & City Council Members  
7887 E 60<sup>th</sup> Ave  
Commerce City, CO 80022

Honorable Mayor and Members of the City Council,

I am writing to express my support of Extraction Oil & Gas' proposed operations in Commerce City. I have been in conversation with Extraction over the past several months and am impressed with the proposed design of their oil and gas operations and the good faith with which they negotiated our land agreement.

As a resident of Commerce City, I whole-heartedly support the Operator Agreement. Per the details of the agreement, I believe that Commerce City is well positioned to determine what is best for its community when it comes to oil and gas development. In fact, Commerce City's Operator Agreement with Extraction requires that Extraction go above and beyond current regulations and even those of the recently signed Senate Bill 181. Through this agreement, Commerce City truly has local control over oil and gas development within its jurisdiction.

As a Commerce City landowner and mineral owner, I acknowledge a vested interest in retaining my ability to safely and responsibly harvest the resources on my property. Extraction's best-in-class development design and proven willingness to work with communities is the reason I support their Operator Agreement with Commerce City. Both the land agreement Extraction has with me and the Operator Agreement provides certainly for oil and gas development and any planned surface development now or in the future.

We have been working with Extraction for over two years now and are impressed with their efforts to make sure that they are a good neighbor to our developments. They have always gone above and beyond to help minimize the impact that their operations have on the community and fully support them and their operation throughout not only Commerce City, but also the entire Denver MSA.

I also support the economic benefit to the City that Extraction's operations will bring. As part of the more than \$350 million Extraction will pay in taxes over the life of the project, \$34 million will go to Commerce City and local infrastructure improvements while \$137 million will fund K-12 school districts in Commerce City. I'm sure our area schools, teachers and students will appreciate the additional funding and help turn around some of our low achieving schools.

Please consider all the positive benefits oil and gas development brings to Commerce City and its residents and approve the Operator Agreement with Extraction Oil & Gas.

Sincerely,

Andrew R. Klein

Westside Investment Partners, Inc.