

Comments to the MEC
June 7, 2013

1. Setbacks

Don Kovasckitz's presentation shows that usable land for natural gas development will be very limited and fragmented. This is true when applying minimum setbacks from homes, roads, drinking water wells, utilities, etc.. When Don applied wider setback distances used in the more modern drilling programs, space for pads and other infrastructure almost disappeared. This begs the question is there room for natural gas development in Lee County?

2. Emergency Response Problem if you disclose chemical name but not concentration.

How do you label a container of a mixture of an acid, an oxidizer, a flammable, and toxin? You would know the name of the chemicals but not the quantity. So based on the name of the chemical, the container would be labeled or placarded for each hazard class. But one chemical, if present in a significant amount may be the one you really need to know about. That chemical will determine your emergency response---personal protection equipment, evacuation distances, etc. Hence, you need to know the percent composition to know what chemical is important in a mixture.

3. Air Pollutant Emission Factors

Recently EPA was criticized by the Office of The Inspector General because its emission factors for natural gas development are out of date and inaccurate. There is a pervasive lack of good air quality monitoring data for natural gas drilling sites. It is important that DAQ take the lead on testing and obtain its own emissions data for all types of sources: drilling, pits, condensers, glycol hydrators, tanks compressors, etc.

http://www.epa.gov/oig/reports/2013/20130220-13-P-0161_glance.pdf

4. Permit the Development Phase of NG Development through Drilling.

The DAQ should permit the development phase of natural gas development through drilling. In aggregate, there is enormous pollution from diesel trucks and motors, the drilling operation itself, as well as the sources listed above.

5. Mobile Air Monitoring Station

The DAQ needs to invest in a mobile air monitoring station to be able to measure emissions at fence lines and at various emission sources.

6. Additional Baseline Chemical Testing:

The DAQ needs to add the following chemicals to its list for baseline testing: hydrogen sulfide, hydrochloric acid, hydrofluoric acid, methanol, ethylene glycol, methane and wet gases (ethane, propane, butane, etc.) , PAH's especially naphthalene and carbon monoxide.

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