

January 11, 2012

2011 rdSGEIS Comments
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-65010

The League of Women Voters of the City of New York City recommends a moratorium in New York State on issuance of drilling permits for horizontal (and vertical) wells until: 120 days after the federal EPA issues a report on the effects of hydraulic fracturing on water quality and public health; incorporation of the findings of that report into the state legal and regulatory process; and adoption of a legal and regulatory environment sufficient to protect New York's natural resources and public health. The health impacts of HVHF have not been analyzed by an independent scientific entity or considered in the rdSGEIS. In addition, New York State has no wastewater treatment plants designed to treat fracking wastes in place and ready to handle the large quantities of waste due to be generated by the process; deep injection wells of the fracking brine in Ohio and Arkansas have preceded earthquakes.

As New York City residents, The League of Women Voters of the City of New York strongly supports the recommendation in the Dec. 23, 2009 Hazen and Sawyer Report done for NYC DEP http://www.nyc.gov/html/dep/pdf/natural_gas_drilling/12_23_2009_final_assessment_report.pdf, p. 99. Mitigation of risks to drinking water quality and infrastructure integrity will require revision of current setback provisions to reflect the occurrence of laterally extensive subsurface faults, fractures, and brittle structures. Based on the preceding analyses, it is recommended that natural gas well construction be precluded within a buffer zone of seven miles from NYCDEC subsurface infrastructure. Further, since the primary area of concern is not the vertical borehole but instead the well lateral and the hydraulic fracturing induced along its length, the buffer zone should be measured from the furthest extent of the lateral (or spacing unit boundary) and not the well pad or wellhead. Both of these Report recommendations need to be included in the dsGEIS to protect NYC's water quantity and quality. Additionally, based on the geology of the area, we support all setbacks to be from the end of horizontal well bore so that no drilling occurs under our water supply.

The NYC West of Hudson Watershed provides drinking water for one-half of the residents of NY State, including NYC residents and we want this drinking water protected. Presently we can drink safe, unfiltered water. If NYC has to filter, it would cost up to 10 billion dollars to build a filtration system and a large addition to the annual budget to maintain it.

We are counting on the DEC to protect NYC's water supply.