December 19, 2012

Submitted via email: hanlon.edward@epa.gov

Mr. Edward Hanlon  
Designated Federal Officer  
Science Advisory Board Staff Office  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20004

RE: Candidates for the EPA Science Advisory Board Hydraulic Fracturing Advisory Panel

Dear Mr. Hanlon:

Western Energy Alliance appreciates the opportunity to provide comments on the nominees for the Environmental Protection Agency’s (EPA) Science Advisory Board Hydraulic Fracturing Advisory Panel. We represent over 400 companies engaged in all aspects of environmentally responsible exploration and production of natural gas and oil across the West. Our members include highly trained scientists and engineers with many years of experience in all aspects of hydraulic fracturing. Western Energy Alliance is happy to see that the list of nominees includes several such members of industry, and we encourage EPA to ensure that a significant number of these industry nominees are on the Hydraulic Fracturing Advisory Panel.

Western Energy Alliance believes that the Hydraulic Fracturing Advisory Panel can positively impact the focus and direction of the EPA hydraulic fracturing study. However, it is essential to appoint a balanced and diverse group of experts to the panel. We believe it is important for EPA to select a panel of individuals with relevant scientific and engineering expertise. This should include those who have practical experience with all aspects of hydraulic fracturing. This will ensure the study remains useful for decision-making and provides practical, scientifically robust results. Nominees chosen for the panel should have a proven track record of rigorous and objective work in their areas of technical knowledge.

Nominees with a history of unfounded bias against hydraulic fracturing or oil and natural gas development are not appropriate for an advisory panel whose purpose is to “provide advice and review the ‘Progress Report: Potential Impacts of Hydraulic Fracturing on Drinking Water Resources,’” and Western Energy Alliance believes EPA should not include such individuals. Unfortunately, there are several nominees who have shown publicly their bias against hydraulic fracturing and oil and natural gas development. We provide a list below.
Michel Boufadel, Ph.D.
Robert Howarth, Ph.D.
Anthony Ingraffea, Ph.D.
Lisa McKenzie, Ph.D.
Karlis Muehlenbachs, Ph.D.
Deborah Swackhammer, Ph.D.
Geoffrey Thyne, Ph.D.
Jeanne Vanbriesen, Ph.D.
Avner Vengosh, Ph.D.
Perry Walker, Ph.D.
Lauren Zeise, Ph.D.

These individuals have abandoned their objective, uninterested scientific credentials by working with and accepting funding from those advocating against the oil and natural gas industry or by publishing error-filled papers on oil and gas operations. Many of these authors have refused to correct their findings even when other scientists unconnected to the oil and gas industry point out their errors. This behavior leads us to question their willingness to objectively review EPA’s progress report.

Thank you for the opportunity to comment on the list of nominees for EPA’s Hydraulic Fracturing Advisory Panel. Western Energy Alliance hopes EPA will honestly evaluate the credentials of the industry nominees and include many of them on the panel.

Sincerely,

Kathleen M. Sgamma
VP, Government & Public Affairs
Western Energy Alliance