

## Questions Related to Wording

### General:

Will this be how the goal is stated?

The goal of this Phase I study was to determine if a threat to public health exists **as a result of USDW contamination** from hydraulic fracturing fluid injection into CBM wells, and if it does, whether the threat is great enough to warrant further study.

### From Executive Summary:

#### ES-4 What Was EPA's Project Approach?

Based on public input, EPA decided to carry out this study in discrete phases to better define the scope and to avoid expending unnecessary effort after assessing the results of the preliminary phase(s). EPA designed the study to have three possible phases, narrowing the focus from general to more specific as findings warranted.

This report describes the findings from Phase I of the study. This study is a fact-finding effort based primarily on existing literature to identify and assess potential threats posed by hydraulic fracturing to USDWs and public health. The goal of this Phase I study was to determine if a threat to public health exists as a result of USDW contamination from hydraulic fracturing fluids injected into CBM wells, and if it does, whether the threat is great enough to warrant further study. The Agency defines a threat to public health **from USDW contamination** by the presence or absence of documented contamination cases stemming from hydraulic fracturing, or by the existence of a clear, immediate contamination threat to drinking water wells. *{Note to EPA: Is the sentence in blue needed? Without this sentence, this section still covers EPA's goal and approach. Also, this sentence discusses threat to drinking water wells which is much narrower than USDWs and different from what is stated in the goal or approach (i.e., USDWs).}*

#### ES-9 What Are EPA's Conclusions?

Based on the information collected, the ~~threats to USDWs~~ **threat to public health from the injection of hydraulic fracturing fluids into** of CBM wells are low and do not justify additional study. A Phase II effort is unlikely to provide any new information that would ~~redirect~~ **affect** the Phase I findings – a lack of confirmed contamination incidents and a low potential for hydraulic fracturing to threaten human health through the contamination of USDWs. *{Note to EPA: Recommended wording change in the previous sentence because findings can't be redirect but actions based on findings can.}* The apparent risk **threat** to public health and USDWs from hydraulic fracturing is not compelling enough to warrant expending resources on a Phase II

effort. *{Q to EPA: Should “apparent risk” be revised to read “threat”? We thought EPA decided not to use the term “apparent” because of public comment that the term indicated that EPA was unsure of its conclusions and not to use the term “risk” because the Agency did not conduct a risk assessment. Also note that in the response-to-comment document, there is a response that indicates that the term “apparent” is no longer used in the report.}*

## **Chapter 2**

### **2.1 Overview of the Study Methods**

EPA developed the Phase I study methodology to aid in determining if a threat to public health exists **as a result of USDW contamination – waiting for meeting to decide** from hydraulic fracturing fluid injection into coalbed methane wells, and if it does, whether the threat is great enough to warrant further study.

## **Chapter 7**

Based on the information collected, the threats posed to USDWs by the injection of hydraulic fracturing fluids into coalbed methane wells and subsequent movement of these fluids are low and do not justify additional study. *{Note to EPA: Should we revise the previous sentence to match the recommended wording in Executive Summary as follows: “Based on the information collected, the threat to public health from the injection of hydraulic fracturing fluids into coalbed methane wells are low and do not justify additional study.”}* **A Phase II effort would not likely provide any new information that would result in conclusions that differ from the Phase I study – those being a lack of confirmed contamination incidents and low potential for hydraulic fracturing to threaten human health through the contamination of USDWs. The apparent threat to public health from hydraulic fracturing is not compelling enough to warrant expending resources on a Phase II effort.** *{Note to EPA: Should the word “apparent” be deleted? Also, did you want to leave any references to resources in the report? One of the early edits to this chapter was to delete the final sentence of the paragraph because it indicated that resources were one of the reasons for not conducting a Phase II study (vs. low threat to public health). This sentence read, “Rather, EPA believes that increasingly tight resources would be better placed on higher priority UIC projects.” This revision would also impact the Executive Summary.}*