



September 29, 2011

To: US Environmental Protection Agency

From: Clean Water Action

Re: Docket EPA-HQ-OAR-2010-0505, Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants Reviews

On behalf of Clean Water Action's 35,000 Texas members and our one million across the country, I want to thank EPA for coming to Arlington and for their strong proposal to restrict air emissions from oil and gas extraction operations. EPA regulations of these large pollution sources are urgently needed here in Texas and in many other communities across the country. State governments including Texas have so far done little to manage gas drilling, and we need the federal government to step in and play a strong role here in protecting public health and the environment.

It is important for EPA to understand that fracking operations in Texas and elsewhere are frequently occurring quite literally in people's backyards. We have over 1,000 gas facilities within the city limits of Ft Worth alone, a city of more than half a million residents. Any rules on air emissions must take into account that people are living extremely close to these pollution sources. We should not be protecting people 'on average'. We need to protect everyone living near gas drilling.

Another important point for EPA to consider is that these rules are urgently needed and should be implemented as soon as possible. EPA should not delay or extend the comment period or the effective date of any of these new rules. Many of Texas' major metropolitan areas, including the DFW metropolitan area, are already in non-attainment under the federal Clean Air Act. New air pollution rules can take a long time to be enacted, and we need these rules in place as soon as possible. There is no moratorium at the state level on permits for new frack wells here in Texas. Thousands of wells have already been drilled here, and many more thousands are planned for the

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near for the near future. Any delay in putting restrictions in place means allowing thousands of new pollution sources in Texas that will have a significant impact on our health.

Finally, we urge EPA to ensure that these rules are as strong as they can be. Best available control technology should be a standard requirement for all oil and gas operations. All significant sources of air emissions must be included in the rules, such as the thousands of open air frac pits that accompany drilling sites. Remember that these pits can also be only a couple hundred feet from where people live. All relevant pollutants should be directly controlled including methane and hydrogen sulfide. Finally, flaring should be completely prohibited. It is simply irresponsible to allow the gas industry to start production at a well, before they have a way to safely control the flow of hazardous emissions.

In closing, I would like to again thank EPA for coming to Texas and for issuing these important rules, and I urge you to implement them without delay. We are looking towards federal agencies such as EPA to step up to the plate and provide the protect we all deserve.

Respectfully,

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Texas Program Director

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