



December 19, 2012

**Sent Via email to: hanlon.edward@epa.gov**

Mr. Edward Hanlon  
Designated Federal Officer  
Science Advisory Board Staff Office  
Environmental Protection Agency  
Washington, DC

**Re: Candidates for the EPA Science Advisory Board Hydraulic Fracturing Advisory Panel**

Dear Mr. Hanlon,

These recommendations are submitted by the American Exploration & Production Council ("AXPC"). AXPC is a national trade association representing 32 of the largest US independent natural gas and crude oil exploration and production companies. Our members are leaders in developing and applying the technology necessary to explore for and extract onshore and offshore, including in deep water as well as from unconventional sources. AXPC member companies are, as a group, leaders in adding domestic energy reserves and are committed to doing so in environmentally responsible ways. It is for these reasons that the makeup of this panel is so critical to our nation as well as to our member companies why we feel it important for us to communicate directly with you on this matter. The importance of industry representation on the SAB cannot be overstated. This issue is specifically addressed below.

AXPC is supportive of the creation of an *ad hoc* Science Advisory Board ("SAB") panel to peer review the agency's *Progress Report: Potential Impacts of Hydraulic Fracturing on Drinking Water Resources* ("Progress Report") and act as a technical resource throughout the remainder of the study. AXPC members recognize the potential of such a panel to articulate the issues raised by all stakeholders, including AXPC, regarding the methodology and implementation of the Environmental Protection Agency's ("EPA") hydraulic fracturing study. AXPC also recognizes the vital nature of the panel selection process, and requests that particular attention is paid by the SAB and EPA to ensure the panel contains professionals with the proper expertise and a diversified constituency, including industry.

AXPC acknowledges the broad range of technical competencies and experienced present on the current candidate list. Our members believe the selection of an appropriate panel would both be extremely valuable to the Progress Report and the credibility of the research. AXPC believes the position of its members can be best understood with respect to those particular individuals by reference to the thoughtful comments and recommendations of Lee Fuller of the Independent Producers Association of America.

In addition, AXPC recommends that the final panel include not only participants with professional licenses and relevant expertise, but also participants who possess current, real-world operational experience with hydraulic fracturing operations as well as with associated environmental investigations. A purely academic understanding of operations would merely provide the SAB with an incomplete picture of the depth of current knowledge and expertise with respect to a technique which has been

used on over one million wells over the last several decades. In this regard, technical comments submitted during the Draft Study peer review process by individuals and entities with extensive relevant experience were not incorporated in the EPA's final Hydraulic Fracturing Study Plan. It is our view that the primary cause of this omission was due to the failure to include Panel candidates associated with the oil and gas industry during the Draft Study Plan peer review process. In order to address this issue, AXPC specifically recommends that at least one third of the total membership of the SAB be comprised of individuals with direct experience within the modern oil and gas industry.

AXPC believes the position of its members with respect to the overall selection process is well represented and discussed by comments submitted by Amy Farrell of the American's Natural Gas Alliance, and by the comments submitted by Martin Durbin of the American Petroleum Institute, in addition to the comments by Lee Fuller referenced above.

We appreciate your consideration of our views and look forward to continuing to work with you and others at the EPA as we endeavor to provide America with reasonably priced domestic energy discovered and produced in an environmentally responsible manner.

Sincerely,

A handwritten signature in blue ink, appearing to read "V. Bruce Thompson". The signature is fluid and cursive, with a large initial "V" and a long, sweeping tail.

V. Bruce Thompson  
President  
American Exploration & Production Council