

KEY CONCERNS ABOUT THE DRAFT STUDY

Not designed to answer key question: WHETHER, not HOW, it is in NC's interest to allow fracking/horizontal drilling for extraction of shale gas.

"Economic Impacts" (section 5): focuses on generation and use of revenue, implying that future drilling is expected.

The impacts to be studied are listed in the outline mostly under existing DENR regulatory programs, giving the impression that they can be managed by those regulatory programs.

"Potential oil & gas resources" (section 1): Focus is on general geologic characterization of Deep and Dan River basins, amounts and character of recoverable gas and drilling methodology, rather than study of unique challenging characteristics of the basins, and increased risks of potential impacts caused by unique geology.

"Potential Infrastructure Impacts" (section 3): All surface water quantity impacts will be studied as "infrastructure" issues, once again leaving the impression that water supply and wastewater treatment are manageable impacts through infrastructure solutions, and that use of extensive volumes of water for hydraulic fracturing cannot contribute to environmental impacts.

There is no mention of human health impacts under "Potential environmental impacts" (section 4), while "impacts on fish, wildlife and important natural areas" are mentioned, no mention of human health from air, water, waste or other impacts. Process wastewater "disposal" and "potential for recycling" are terms for a feasibility study, rather than a study of potential impacts to ground and surface water resources.

There is no consideration of health and accident hazards faced by temporary or permanent workers in the industry, or emergency responders in communities where gas development is occurring.

Under "Potential economic impacts" (section 5), almost all topics are related to anticipated income, with only potential costs being that of a presumed regulatory program. Also, no consideration of adverse impacts on local business' supply chains, labor pool, or loss of productive use of farmland.

Under "Potential social impacts," (section 6), there is no consideration of social disruptions related to lease conditions, transient workers, population changes, etc.

Under "Proposed regulatory framework" (section 7), no consideration of extensive records of violations, lack of inspections, and failure of regulatory follow up or prevention of spills and accidents. State regulatory programs that STRONGER has reviewed have not included assessment of enforcement of state regulations or consequences of non-enforcement.

To see the draft study, visit

http://portal.ncdenr.org/c/document_library/get_file?uuid=2c8ce43c-1b8b-4a60-b7be-8f29d54d0ed9&groupId=14

