Department of Energy:

I am commenting on the LNG Economic Study. As a fisherman, officer of Trout Unlimited and board member of Tri County Trout Club, I have expertise and deep concerns about water quality.

The hydraulic fracturing process that has made the extraction of shale gas possible is having noticeable effects on Pennsylvania and West Virginia streams, riparian areas, rivers and woodlands. Other states have reportedly suffered similar effects. It is obvious that the state environmental protection agencies are unable to adequately protect the natural environment due to the rapid development of this resource. Rather than recognizing that this process is evolving and essentially experimental and should therefore proceed slowly, in conjunction with data collection and studies, the industry seems to be moving as quickly as possible, unconcerned about potential short or long term consequences. Without data and studies, the protective agencies are regulating in the dark. It is not only the drilling process itself, but the water withdrawals, the pipelines, the waste disposal, the spills, the abandoned coal and conventional gas wells which provide pathways to pollution, that threaten, not only streams, but ground water and drinking water supplies. Some studies estimate that Pennsylvania has as many as 350,000 abandoned, conventional gas wells - most of them uncapped and unmapped. Pennsylvania and the federal government will be mitigating acid mine drainage from abandoned coal mines for countless years. Have we learned nothing? By permitting the export of natural gas, DOE is putting a stamp of approval on these poorly understood risks that will add to this legacy.

Surely, you are aware that the industry has begun unconventional, shallow drilling for oil - and possibly gas - increasing the risks to water exponentially. Industry explains that shallow fracturing is essential for them to compete in the export market. Less expensive, shallow fracturing also allows small, unexperienced, under capitalized, less reputable companies into the marketplace. Again, DOE export permits would endorse and encourage this incomprehensible risk.

The NERA macroeconomic study not only neglects external costs and risks, but it also ignores the economic sectors that are negatively impacted by extensive hydraulic fracturing, most notably, agriculture and its suppliers. Other sectors that will decline are tourism, outdoor recreation, and sportsmen's activities. The real estate market, restaurants and bars may boom in the short term, but will eventually decline as property values diminish and people move away. The boom-bust cycle that leaves communities poorer and emptier, once the resource is depleted, is well known - and also missing form this analysis.

Surely free trade agreements don't give DOE the right to offer up states that sit above gas rich shale formations as sacrifice zones.

Sincerely,

Joseph T. Mercurio
New Kensington, Pennsylvania