

January 8, 2003

The Honorable Christine Todd Whitman
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Ms. Whitman:

On behalf of the National Drinking Water Advisory Council, I am pleased to submit recommendations resulting from a conference call held on December 12, 2002, in Washington, D.C. Enclosed is a report of the National Drinking Water Advisory Council on hydraulic fracturing, underground injection control and coalbed methane production, which contains specific recommendations for your consideration.

At the past three meetings of the Council, the group has discussed the potential impacts of coalbed methane (CBM) development on water quality and water resources. CBM development has apparently increased significantly over the past two decades and the rate of coal bed methane production is expected to continue to increase in response to the growing demand for natural gas. Because water plays an important role in the CBM development process and because underground sources of drinking water (USDW) as well as surface water sources may be impacted by the process, the Council felt that it was important to obtain more information about this activity. In addition, the Council was advised on and discussed the relationship between CBM development and the Underground Injection Control (UIC) Program as authorized by the Safe Drinking Water Act.

As a result of these discussions, the Council identified four specific areas of concern: 1) the lack of adequate resources needed to implement the UIC Program, particularly the Class V UIC Program; 2) the use of potentially toxic additives in the hydraulic fracturing process; 3) the potential impact of CBM development on local underground water resources and on the quality of surface waters; and 4) the maintenance of the Agency's regulatory and discretionary authority within the UIC Program. The recommendations contained in the report are intended to address these concerns.

Sincerely,

Brenda P. Johnson /s/
Designated Federal Officer
National Drinking Water Advisory Council

Enclosure