



Dear Neighborhood Leaders:

The following is an important letter from businesswoman Deborah Rogers to members of the Fort Worth City Council regarding the latest information on gas drilling emissions testing by the Texas Commission on Environmental Quality. Please share it with your residents and other neighborhood leaders in your area.

February 1, 2010

Subject: ***URGENT*****TCEQ Final Report

Dear Mr. Mayor and Members of Council,

The Texas Commission for Environmental Quality (TCEQ) released its final report last week regarding air testing in the Barnett Shale region. After careful review of both the toxicology and the final report, it becomes clear that gas drilling activity is indeed having a detrimental effect on our air quality in North Texas. Unfortunately, the citizens and the Council have been given information which at times is inconsistent and puzzling.

The report indicates that high levels of benzene are at approximately 1 of every 2 facilities. A total of 43 facilities were tested and 21 were found to have benzene levels "higher than TCEQ would like to see." This is important to note because as citizens we live next to facilities and will be affected by any point source at that facility which is emitting toxins. They went on to state that "gas production facilities can, and in some cases do, emit contaminants in amounts that could be deemed unsafe."

According to TCEQ's Toxicology Report, "twenty one facilities (52 samples) in 12 geographic locations registered benzene above long term health based screening levels", or roughly half of all facilities tested.

In addition to the findings of benzene, elevated levels of carbon disulfide, ethane, 1,2 dibromomethane and isopentane were detected above short term health based comparisons at some sites. In total, "35 chemicals were detected above appropriate short term comparisons". The addition of these chemicals simply adds to the toxic mixture in our air.

Further, NO_x was detected in multiple samples and as we all know NO_x is a primary constituent of ozone. Odorous compounds which could cause odor related illness were also found at high concentrations.

Further, on January 12, we were told that 126 sites had been tested in Ft. Worth. But of these 126 sites only eight canister samples were actually taken. Most of the sites had merely been screened with infra red cameras and vapor analyzers, neither of which is designed to test ambient air. Further these electronic devices can be compromised in cold weather. Eight samples do not indicate a comprehensive review. Dr. Honeycutt, Chief Toxicologist of TCEQ, made a statement recently to the Star Telegram that the first round of tests in Ft. Worth was "more of a screening. We're not done in Ft. Worth by any stretch of the imagination."

So where does this leave us as citizens? What picture are we meant to draw from this rather dense and at times confusing information?

It is this. While TCEQ does plan to implement changes that are designed to mitigate some of the detrimental effects of drilling, the fact remains that they only have 17 inspectors for the entire Barnett Shale region. That is 1 inspector for approximately every 1000 wells and this does not include compressor stations and all the other peripheral equipment needed which also require inspection. In the case of compressor stations, these can indeed be of greatest concern. In short, TCEQ cannot possibly police this effectively or adequately. The drilling activity has simply grown too large. We are asking them to do the impossible.

The only way to adequately protect our families, homes and businesses is to implement changes to the gas drilling ordinance which would impose more stringent requirements and thereby lessen the burden of policing. Further on-going monitoring must be conducted for the life of the wells and this cost should be borne by the operators as part of the permit process and considered a normal cost of doing business in such a densely populated area. Contractual obligations with local universities who have in-house testing capabilities could be entered into on behalf of the City which would be highly cost effective and thereby keep testing independent of both the City and the operators.

Technologies exist which are inexpensive and can reduce emissions by 99%. In fact, in a recent memorandum by EPA it was stated that if the operators implement pollution technology and capture the methane which can then be sold, such technologies pay for themselves typically in about 2 months. These technologies must be imposed by the ordinance. There is no excuse for not utilizing them when they are this inexpensive.

We now have our answer as to the effects on an immediate neighborhood by one of these facilities. The State has confirmed our fears. The air in North Texas is indeed being adversely affected by drilling activity. There are myriad other questions which remain to be answered such as the extent of carbon disulfide and other toxic contamination in addition to the benzene. Carbon disulfide and reduced sulfur compounds are being detected at pad sites in Ft. Worth and Denton County in private testing. This will only exacerbate the problem. We must act responsibly to ensure that our health and safety are protected. We must face this head-on and through responsible action make Ft. Worth the beacon she deserves to be in North Texas.

Sincerely,
Deborah Rogers

President of FWLNA
Fort Worth League of Neighborhoods