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Subject: Feedback on Hydraulic Fracturing Directive

Dear Sir or Madam

It is with great concern that I read the proposed draft directive. The simplest statement to sum up what I read is that *there is absolutely no mention of the public, the surface owner or residents and how their interests will be protected.* Is this another example of the ERCB's publicized statement that they feel they owe the public no duty of care?

Given the latitude to offer suggestions for improvement, I would recommend firstly that all of the "may"s, "recommends" and "expects" be replaced with the word "must" or "will enforce" (ref. Clause 1.4 and 3.3).

There is much "talk" that the practice of fracturing is safe. This directive clearly indicates that the writer knows this is not true, as there are many references to managing the risks. Honesty is at least commendable. Under Section 3.3 I clearly doubt that writing a better risk management assessment is going to fix a fracture blow out. Please include what is to be done in the event of the fracture impacting people living in the area, not just another company's well bore. A well bore is just pipe and cement that can be replaced. People's lives or their health are not so easily replaced or repaired. There is not even the requirement to notify the surrounding community or the landowner of an infraction. Shame on the writer for such callous concern.

The consideration of non saline aquifers would also be commendable if it were not for the fact that the writer has set the criteria above acceptable standards for human use. The acceptable salinity level is identified to be 500 ppm and the acceptable TDS level to be under 1000 mg/l according to Canadian Drinking Water Standards. The standard of 4000 mg/l is recognized only by the oil and gas industry.

Relating to the Requirements listed under 4.3.2 15(d): It is already common knowledge that fracturing fluids contain biocides, gels, foamers, etc. (see partial list available under FracFocus). Any of these products will cause deterioration of water quality, so what kind of evidence do you expect to get? A more important question would be: does the ERCB employ scientific experts qualified to determine the impact of these chemicals and particularly able to determine equivocally what those chemicals become once mixed and injected underground into a hydrocarbon environment possibly laced with radioactive elements that may cause thermal changes

which promote further chemical reactions? Honestly, I doubt they are prepared to even hazard a guess at that.

Clause 8- Notification Requirements

Why is the licensee allowed a narrow window of 5 days prior to commencement to notify the ERCB, when applications are often filed months prior to drilling? The type of well application indicates the likelihood of hydraulic fracturing being used to extract the product. ERCB officials should be on site to measure or a log of volumes used sent daily to the ERCB office. If the companies cannot meet that criteria, then perhaps the hydraulic fracturing should be halted until they can. The gas isn't going anywhere until they frack, or is it?

Sections 5 & 6: Hydraulic Fracturing Near Water Wells or Near Top of Bedrock

I object to the use of the terms "a conservative and precautionary approach". That term can best be simplified to mean a "do nothing action" and again provides no protection for the water wells or the people who depend upon the aquifer for their personal and business use. There is no mention of penalties or remedial plans if impacts occur. The "slap on the wrist" regulations that we have in place at present are not good enough. Why should the taxpayers be expected to pay the costs of clean up or damage to property when companies are clearly the initiators of the incident? If they were in fear of having their licenses withdrawn or paying penalties that equate the true cost of clean up, perhaps they would try to operate only when and where it is safe and with due caution. If the companies object to such regulations, community bonds at the value of the expected return of the first year's production from the well should be required so damages could be remediated by drawing upon these bonds.

Finally, I would recommend that regulations in Alberta would truly be written with an intention of enforcement and with penalties accurately reflecting the seriousness of the offense. Self regulation and voluntary reporting by the offenders offers about as much security as asking a convicted bank robber to watch the vault.

Sincerely

Ronalie Campbell