



May 20, 2010

Mr. Richard Greene, Moderator
Members
City of Fort Worth Air Quality Study Committee
1000 Throckmorton
Fort Worth, TX 76102

RE: Comments on Air Quality Study RFP and scope of services

Dear Mr. Greene and Members:

On behalf of our member organizations, the Fort Worth League of Neighborhoods is interested to comment on the Request for Proposals and Scope of Services for the proposed Air Quality Study on gas drilling emissions in the city. We believe gas drilling emissions to be potentially the most important public health issue the City has faced in almost a century.

As City officials (both elected and staff) and the selected committee contemplate the Air Quality Study, it is well for all of us to remember a couple of things. First, the U.S. Environmental Protection Agency's study of hydraulic fracturing in shales in the U.S. is JUST beginning and is estimated to take more than a year. Second, the City of Fort Worth is really behind the curve on this issue. We cannot assume that what has been done over the past years has provided adequate environmental protections from the effects of gas drilling because we have been in an "unknowing" atmosphere.

The effects of gas drilling at this pace and at this level in this densely populated area are unprecedented. We are barely at 20% buildout in Fort Worth. We're facing 4 to 5 more years of drilling at this pace to reach 100% buildout. We must have a model today which foreword predicts the 100% buildout so that we know what we are facing now and in the future in terms of impacts of drilling on the citizenry.

The City came up with the idea to produce the one shot Air Quality Study. We suggest that the study **may** produce a glimpse, but only a glimpse, of the true picture of the impact of gas drilling emissions in Fort Worth **at the time the study is conducted**. It will be nothing more than a glimpse at a set point in time. That is why a process for monitoring the emissions at gas wells should be put in place on an ongoing, continuous basis for the life of the wells. That process should have started two years ago. The questions remain, "What are we waiting for to begin that process and why are we waiting?"

For purposes of the Air Quality Study, information on these emissions on an AGGREGATE basis is the key to presenting an accurate picture of the situation Fort Worth faces.

We are asking that the addendum to the Request for Proposals include the following points:

1. As we have noted before, the City should institute a process (paid for by the operators) for ongoing, random 24 hour testing of emissions from all equipment at all wellsites in the city. The Air Quality Study RFP should include language which requests the design of this process as a part of the study.

The City's Gas Drilling Ordinance, revised last in 2008, already includes provisions for continuous monitoring for sound at well sites. Surely gas well emissions are more important to public health than noise issues. Why wouldn't it be just as important to do continuous monitoring of emissions at these well sites?

2. Include a requirement in the study that includes a pilot program for City Gas Drilling Inspectors to periodically conduct spot testing on various gas well site equipment, using Flir cameras. This program should be put in place as a permanent part of the City's gas well inspection process.
3. Ensure that the study firm tests air quality outside the limits of the City of Fort Worth. Citizens need to know what is drifting into our city from gas wells outside the city limits.
4. Ensure that the study firm recognizes that gas drilling has never been done on the present scale in an urban area as densely populated as Fort Worth. Ensure that the firm designs its air quality study to take that fact into consideration.
5. Ensure that the final air quality study includes dispersion modeling on emissions on all gas drilling equipment for the projected citywide buildout of all drilling.
6. Include in the final air quality study a life cycle analysis of a well.
7. Include a provision in the air quality study for ongoing, random 24 hour testing of emissions at the first 10 wells permitted and commencing in September 2010. The study should provide that 2 randomly placed canisters are placed at each of the 10 wellsites a) during drilling and b) during fracing procedures.
8. Use also at the sites listed in Recommendation No. 7 the driveby testing method _____ (name)
9. Ensure that the air quality study provides monitoring of air quality in neighborhoods, at schools and at facilities which house the elderly which are near (within 1/2 mile or less of) well sites. Ensure that continuous, random 24 hours air testing occurs at these wellsites (paid for by the operators) beyond the life of the study and for the life of the wells.
10. As an addendum to this study, the City should employ a health professional to conduct ongoing studies of the health effects of gas drilling on Fort Worth citizens. The suggestion has been made that the University of North Texas Health Science Center faculty could provide such a professional.

11. The Air Quality Study Committee and city staff should diligently research (“dig for” is a better term) any conflicts of interest on the part of any firm chosen to conduct the air quality study (or its subcontractors) with the gas drilling operators or gas drilling industry.

To believe in the integrity of the study, the public needs to know what work the candidate firms have or the selected firm has done for anyone in hydraulic fracturing shale fields. This includes ferreting out any work the candidate firms or the selected firm (or its subcontractors) have done with the major firms (or their subcontractors) working in the City of Fort Worth or the Barnett Shale including Devon, Chesapeake, Quicksilver, XTO, or any other firms active in gas drilling in the City of Fort Worth.

12. Ensure that the final Air Quality Study components include public meetings where the study consultant produces in lay terms for the general public the results of the study.

There has been too much gas drilling industry and technical “lingo” bandied about in public about the very serious issues of gas drilling in an urban area and about the environmental effects of drilling on the citizens.

The City owes every citizen an explanation in lay terms of the reality and complexity of urban gas drilling and its effects on the populace. The City made a choice to put gas wells close to schools, neighborhoods, and other densely populated structures and areas. For instance, the City needs to be able to say to Fort Worth parents in these situations, “We are monitoring the gas drilling emissions near your child’s school everyday and your child is safe,” not “The emissions coming from the wellsite near your child’s school do exceed (or do not exceed) ESLs.”

Thank you for consideration of our comments and for including them in the addendum to the Air Quality Study to be addressed by the applicant firms.

Sincerely,

Libby Willis
President

