



October 12, 2011

Honorable Betsy Price, Mayor
Members
Fort Worth City Council
1000 Throckmorton
Fort Worth, Texas 76102

Re: Gas Drilling Ordinance Revisions

Dear Mayor Price and Council Members:

Attached is a summary of the City's proposed revisions to the Gas Drilling Ordinance with League of Neighborhoods comments added in red. These recommendations are based on our current research, comments from experts in the field, our November 2008 ordinance recommendations, our October 2010 federally funded study on gas pipelines in Fort Worth, and our February 2011 report and recommendations for gas drilling near FWISD schools.

Our biggest concern with the present set of City proposals is the recommendation to allow the establishment of wastewater disposal wells within the City limits. Since the City has maintained a moratorium on the establishment of these wells for so long, the question is, "What has changed now that would prompt the City to consider allowing the placement of such wells?"

As you will see in our comments, we are asking that the City **not** allow the establishment of such wastewater wells inside Fort Worth. We are greatly concerned about the potential for water contamination posed by these wells as well as the now proven connection between these wells and an increase in earthquakes near them when they are placed over or near fault lines. Even industry sources say it is imperative to have the best information available about a region's geology when deciding where to place or not to place these wells.

Earthquakes caused by siting and use of wastewater disposal wells in central Arkansas have caused such damage to the land that it will probably never be useable again. Recently, because of the connection between wastewater disposal wells and earthquakes, these wells have been banned in central Arkansas. We are concerned about the possibility of similar damage to residential property if wastewater disposal wells are allowed to be established in the city.

There are too many unanswered questions regarding additional financial impacts to citizens as a result of wastewater disposal wells being placed near residential properties. How many wastewater disposal wells would there be in the city? Where? How much waste would be allowed to be injected on a daily or weekly basis? From where would all the waste come? Would some be piped underground as well as trucked in? How would such placement of

wastewater disposal wells affect residential market values? How will such placement impact residents' insurance coverage, rates, premiums and deductibles? What evidence does the City offer residents ensuring that property near wastewater disposal well sites will not be negatively impacted either physically or financially?

Similarly, we are concerned about the loss of millions of gallons of water in the natural gas fracking process in a continuing time of drought in our city and state. Already the City of Southlake has banned fracking operations during summer months to conserve water. The use of "old" technology such as wastewater disposal wells does not conserve water when we have a growing need for it and lack of it and that is a concern that all of us have. This water, unlike nearly every other residential, recreational, or industrial use in Fort Worth, is permanently removed from our fresh/drinking water supply.

But we aren't just saying no. There are now more options than 1) putting millions of gallons of chemically laced frack water in wells in the ground or 2) trucking the wastewater outside the City limits. We're asking that the City study what other cities and states involved in gas drilling are doing to deal with wastewater from natural gas drilling and return more water from the process back to our water systems. We are particularly intrigued by a solution used in Pennsylvania – the mobile evaporative unit.

Please take a serious look at how this technology could be used in Fort Worth. We also suggest that a task force visit other states (Pennsylvania, New York, etc.) to study their answers to wastewater disposal and best practices and provide a report to the Council and the citizens. Therefore, the present moratorium on wastewater disposal wells inside the City should continue while this research is done.

We are interested to see that Fort Worth is on the cutting edge of gas drilling technology as we believe that would not only be the best answer for our local air and water quality, but would also help to create new "green" jobs and stand the City in good stead on the national energy stage. We would like for Fort Worth to be able to say, "We're producing energy here and we're doing it in the cleanest, greenest manner possible that protects our citizens and our environment."

Among our other enclosed comments, you will also note that we are asking that, under "Air Quality," the City use a more coherent and comprehensive list of best practices than those noted in the draft ordinance language. Please read our comments and let us know if you have questions or comments. We appreciate the opportunity to comment on the proposed ordinance revisions.

Sincerely,

Libby Willis
President