

**TOWN OF HECTOR**  
**5097 NYS Route 227**  
**Burdett, NY 14818**  
**(607)546-5286 phone**  
**(607)546-5200 fax**

January 10, 2012

dSGEIS Comments  
NYS Department of Conservation  
625 Broadway  
Albany, New York 12233-6510

On behalf of the Town of Hector supervisor and town board, please accept this as our formal response to the dSGEIS on the use of hydraulic fracturing as it relates to gas drilling within New York State. We have concerns as to the process currently in use. The amount of water it takes and the undisclosed chemicals used that are said to contain carcinogens and other endocrine disruptors is unacceptable. Full disclosure of the chemicals used in the process is necessary as other states have required and been agreed to by all groups. Products of that nature should never, ever be pumped into the earth for any use. There is nothing more precious than our water. Without fresh water we are without life. The Finger Lakes of New York State and the Great Lakes hold 25% of the fresh water in the world.

We feel that the New York State Department of Environmental Conservation (NYSDEC) should not go forward with issuing any gas drilling permits until there is a process that is fully developed and declared safe without the contamination potential the current process could have on our water supply. At this time there seem to be no clear rules or regulations in place to handle drilling waste solids. There are currently no waste water treatment plants in our area that are capable of taking on the wastewater that would be generated by this type of fracturing process. We do not believe at this time there is any type of sealing system in existence for the wastewater that could withstand the rigors of possible seismic activity and remain viable and intact long term. To our knowledge, there has been no specific study to address the possible seismic activity that could result from hydraulic fracturing. With the recent earthquakes in Ohio possibly linked to hydraulic fracturing wastewater being injected into the ground for storage, this is another indication that this does not appear to be a safe process. Wastewater disposal would not be a problem if the issuing of permits was delayed until there was a safer drilling process in place that did not require the use of millions of gallons of unsafe chemical laden water. The risk of possible water contamination could affect many generations to come. The potential risk to our clean water, environment and way of life is far too great. We recommend that before NYSDEC issues any drilling permits that they have performed studies on storage and or disposal of drilling waste products and concluded them to be safe.

Governor Cuomo has given the Catskill and Syracuse watersheds protection from the gas drilling and hydraulic fracturing industry because they use an unfiltered water supply. The Town of Hector is the second largest town in area in New York State and is largely dependent on wells for water. Seneca Lake is a priceless asset within the Town of Hector and is also our water source for the portion of the town that has municipal water. Seneca Lake is a vital part of the two largest industries in our area including agriculture and tourism. As the town board of a municipality within the Seneca Lake boundaries, we request that gas drilling be prohibited within 4,000 feet of any Finger Lakes, which are all bodies of drinking water and which is the same protection that is afforded the Catskill and Syracuse watersheds.

The Town of Hector also has 150+ miles of local roads of which approximately 10% or 15 miles are seasonal use, 37% or 50 miles are paved and the remaining 85 miles are gravel. Our roads could be devastated by the gas industry's heavy use as it operates currently. The town of Hector has the only National Forest in the State of New York. The National Forest within the town has 11,000+ acres which is a great asset to hundreds of thousands of people in the area and many who visit each year. We have recently learned that there is a small Canadian company currently in the development stages of a new process to extract the gas

using propane gel, Butane and sand with great results. This process uses no water or chemicals at all and has a greater recovery rate than the hydraulic fracturing process currently being used. With no water being used in this potential new process for gas extraction, it would possibly reduce the proposed traffic volume by 50% or more. There would be no water to be disposed of or treated. This would allow the land to be reclaimed more rapidly with this type of extraction method. We support the alternative approach, where feasible, for the applicant to review and consider the use of alternative additive products that may pose less risk to the environment, including water resources.

It appears that the first economic study wasn't bid out as required and was given to a contractor that was known to favor the gas industry interests. We are also of the understanding that a second economic study has been contracted and will not be completed until after the public comment period has passed. We believe that the NYSDEC should initiate a study on the potential health impacts of hydraulic fracturing before any permits are considered for drilling. There is also the question of how the state plans to fund the additional employees needed to properly oversee the permit and regulation compliance aspects of this industry.

On behalf of the Town Board of the Town of Hector we urge you to hold off on issuing any permits for hydraulic fracturing at this time until deemed safe by appropriate state and federal environmental agencies. We firmly believe that there will be a better, safer means of extracting this natural resource in the not so distant future. The United States is not in short supply of natural gas or propane at this time. Therefore we do not see the need to go forward with issuing permits to drill for these natural resources until or unless there is a safe and sound process to do so. Governor Cuomo has made statements to the effect that we do not have to be in a rush to drill as the gas isn't going anywhere. We are in full agreement.

We understand the potential for a positive economic impact that gas drilling could bring to our Town. However, we also realize that there are some negative impacts to our region such as increased traffic and lack of affordable housing. Based on all of the information we have gathered regarding hydraulic fracturing and its possible impacts on our region, the Hector Town Board feels that the NYSDEC should not issue final regulations until all necessary studies are evaluated and completed. Also, we have attached a hard copy of a citizen's petition of some 763 verified signatures of Hector Town residents in opposition to hydraulic fracturing.

Sincerely,

---

Benjamin R. Dickens  
Town Supervisor

---

Mike Bergen  
Town Board

---

Alvin White  
Town Board

---

Jeff Mangus  
Town Board

---

Cliff Yaw  
Town Board

---

Marie Stevens  
Town Board