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The draft New York State energy plan calls for the development of clean in-state energy supplies, and includes natural gas in this category. Natural gas from unconventional sources, most notable large-volume horizontal drilling and hydrofracking does not qualify as a clean energy supply. The Energy Plan acknowledges some of the environmental problems of this extraction technology (Section 3.6). To date, there is no satisfactory disposal plan for the huge volumes of water mixed with toxic chemicals resulting from hydrofracking. The proposed SGEIS does not adequately address non-toxic alternatives to the current set of hydrofracturing chemicals. Even if the NYS DEC regulations were adequate to protect New York State residents, the DEC is understaffed and underfunded to guarantee that state regulations are complied with. Fish kills in Dunkard Creek on the PA/WV border, water well problems in Pennsylvania, and an EPA report detailing increased methane levels in water wells in the West all underscore the environmental hazards of non-conventional gas sources. The pipelines required to connect the many wells in this region will create significant loss of forest habitat and greatly increase habitat fragmentation. Unconventional natural gas supplies are NOT clean energy.

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Comments on NYS Energy Plan of 2009:

In Section 1.2 you have included natural gas under “Clean Energy Strategies.” This is clearly a financially and politically-motivated inclusion, and it needs to be removed. As you well know, the extraction and transportation of natural gas come with severe fragmentation of habitat, and contamination of surface water, ground water, soil, and air with materials that are classified as hazardous under federal laws (except that they are not required to be handled as hazardous due to the massive money and lobbying power of the gas industry). To try to deny any of this is ludicrous, so I hope you will not attempt that. Two minutes on the web will turn up hundreds of cases of spills, accidents, and leaks, as well as data on the gradual build-up of methane in groundwater as the number of gas wells increases, as found by Geoffrey Thyne (2008) in *Phase II Hydrogeologic Characterization of the Mamm Creek Field Area, Garfield County, Colorado*.

The only time natural gas is known to be “cleaner” than coal and oil is when it is burned. But fossil fuels contribute to health problems and environmental degradation in New York (and all over the world) not only when they are burned, but during their extraction and processing as well. It is unconscionable that you would focus only on one small part of the life cycle in promoting the expansion of natural gas exploration under a “clean energy strategy.” Unless you have actual data showing the complete life cycles of each of these fossil fuels (from extraction through burning, including all the equipment used, external costs to our health and environment, etc.), you have no right to be calling natural gas a clean strategy. This has no applicability to the real world--only to the political world and the world in which big money talks.

Before you promote or even ALLOW further natural gas exploration in this state, you need to have not only life cycle data, but data on the rate and extent of health problems of people living near natural gas operations, as well as the rate of environmental contamination. That data does not exist--or at least if it does, I have not seen it. If you continue to promote natural gas as clean, I ask you to give me some references (not carried out or funded by the natural gas industry) to support this. Otherwise, you should be honest about what you actually know.

Natural gas exploration is the single biggest threat to the health, safety, and environment of residents of New York State right now--and possibly in the history of the state, as well. To see you promoting it is a nightmare come true for those of us whose entire quality of life, property values, and health are about to be ruined. I see that one Planning Objective of this Energy Plan is “Reduce Public Health and Environmental Risks: Reduce health and environmental risks associated with the production and use of energy across all sectors.” I would love to hear an actual scientific explanation based on data as to how you justify increasing natural gas exploration as contributing to that.

On top of that, you plan to give our tax dollars to the multi-billion dollar gas corporations to help build pipelines so that they can have bigger profits. I have seen the financial spreadsheets for the gas companies working in my area of the state, and I assure you that they are much better off than the average resident here, so please explain why taking our money to help them is

fair to us. The only explanation for this is that lobbying money from them into the accounts of our state elected officials has done its job well to benefit the gas companies.