



**Testimony of Nicole A. Dillingham, Board President of Otsego 2000,
on the EPA Clean Power Plan Proposed Rule Dated June 2, 2014**

Pittsburgh, Pennsylvania, August 1, 2014

INTRODUCTION

Otsego 2000 is located in Cooperstown, New York on historic Lake Otsego. We are a nonprofit organization founded more than thirty years ago to protect the rural, historic, and environmental resources of the region. We are famous as home to the Baseball Hall of Fame. Our economy is based on tourism, museums, agriculture, organic farms, world-class breweries, outdoor recreation, and a robust second-home market.

We are also the headwaters of the Susquehanna River, one of the world's oldest river systems and the second largest river system in the United States. The significance of the Susquehanna River is well known. It supplies nearly half of the fresh water in-flow to Chesapeake Bay and, along its historic route, serves more than eight million people adjoining the major population centers of the East Coast.

Chemical and industrial pollution of Lake Otsego and the Upper Susquehanna River watershed would have a devastating impact on our home and the entire eastern seaboard.

I. The Public Is Misled by the Claim that Natural Gas Is A "Clean" Fossil Fuel.

The Clean Power Plan fails to recognize the risks of methane as a powerful greenhouse gas, one that is much more intense and damaging than carbon dioxide over both a 20 year and 100 year horizon. In fact the EPA's Inspector General, just this past week, on July 25, 2014,

offered a report stating that the EPA must do more to reduce methane leaks in distribution lines to customers. My focus, however, is on the EPA's failure to address methane emissions upstream. The Plan's attention to carbon dioxide emissions from combustion, without regard to the full life cycle emissions associated with production, processing and transmission of natural gas to power plants, is a serious error of logic and science.

The Clean Power Plan consumes many pages attempting to convince the public that carbon dioxide emissions are costly, that they negatively impact the environment, and that conversion to a cleaner "burning" fuel will save money and save lives. For example the Plan expressly tells the American people that the Plan will "protect our health and environment now and for future generations." However, because the proposed substitute fuel (natural gas) is as dangerous or more over a life-cycle analysis than the coal it is replacing, this is a patently false statement and offers a false hope.

II. Health, Environmental, and Climate Impacts of Natural Gas Use Must Be Addressed.

The scale of gas related industrialization and its risks to the environment and future generations are unprecedented. In our historic region, and throughout the Marcellus shale play, industry would install a well-pad every square mile, with 12 horizontal wells per pad, each well to be fracked and re-fracked with millions of gallons of fresh water mixed with carcinogenic chemicals, over 60 years. The wells will be connected through gathering lines over agricultural lands and supported by thousands of truck trips per frack cycle to bring in chemicals, water, and equipment, and then to haul out flow-back, produced water, and solid wastes.

People not living adjacent to well-pads will not be spared. They will be impacted by heavy truck traffic, by gas infrastructure (including compressor stations and processing plants which operate 24/7 emitting air toxins, noise and light), by pipelines that leak methane, by toxic wastewater released into drinking water sources, by radioactive wastes disposed of in landfills, by toxic brine spread on roads, by radon gas, by

permanently scarred view sheds, by earthquakes, and by potential climate disaster.

Significantly, the Clean Power Plan admits that there are enormous societal and health costs associated with carbon dioxide emissions. The Plan states that the climate and health benefits of reduced carbon dioxide emissions will be \$55-93 billion per year in 2030. The Plan also attempts to assure us that the estimated costs of the Plan, which are projected to be \$7.3-8.8 billion, will be eclipsed by the assumed benefits. The Plan even projects that for every dollar invested, the American family will see up to \$7.00 in health benefits. What if these projections are wrong due to the increased environmental and health impacts of conversion to natural gas?

It is not acceptable for the EPA to put forward a Plan and claim such prospective benefits without addressing the full costs to society of reliance on natural gas. Although a cleaner fuel when burned, natural gas can only be produced and delivered through a crude and damaging industrialized process blanketing the countryside and producing waste that cannot be safely disposed.

III. Natural Gas Prices Will Rise Due to Growing Demand, Exports and Overstated Supply Projections.

The Clean Power Plan lures consumers and business into accepting a switch to natural gas only to be financially squeezed later. Prices can be expected to rise substantially if the United States becomes a major exporter of natural gas and LNG as the industry demands. This is because consumers and electricity producers would have to compete on the global market with countries that are accustomed to paying as much as five times more for gas than Americans.

The Plan also erroneously states that projected low prices reflect the nation's "extensive" shale gas resources. It fails to acknowledge the growing body of evidence that estimates of recoverable reserves have been grossly overstated, that production fall-off rates for shale gas wells have been unexpectedly high, and that the many environmental and health risks of extraction could result in diminished gas production.

It is risky and potentially deceptive to encourage the expanded use of natural gas given the uncertainty of domestic supplies, intensifying plans for the export of those supplies to the highest bidder, and the strong likelihood of escalating prices in the future.

CONCLUSION

It is a profound mistake for the EPA to promote the increased use of natural gas, which will lead to more fracking and irremediable harm to our communities, health, and environment. We cannot afford another failed energy strategy that essentially seeks to replace one dirty fossil fuel with another. Rather than promoting fracked gas, EPA should rewrite its Clean Power Plan to set meaningful targets for the reduction of all greenhouse gases in all sectors, including methane, and the replacement of existing coal and gas power plants with zero-emission renewables. This is the only prudent option to address our climate and health crisis.

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