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# Proponents of Waterless Fracking Punch Back with Facts

Posted on **August 1, 2015** by **Tom Shepstone**



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***The usual crowd of NY fractivists is scared to death by waterless fracking and has launched a campaign against it but advocates are punching back with facts.***

A group of waterless fracking opponents, composed of the same tiny group of well-funded interests operating under different names, have launched a campaign of deceit against the waterless fracking proposals of some Tioga County landowners. It's the usual suspects, of course, playing the usual games, among which is always a letter signed by all of them suggesting diverse environmental groups are arising in mass against a dangerous new threat. It's the oldest tactic in their playbook but this time our side is immediately punching back twice as hard with facts. It's good to see.

What I'm talking about are two dueling letters sent to the New York State Department of Environmental Conservation (DEC); one apparently orchestrated by either Walter Hang (or perhaps his [puppet master, the Fractivist Rasputin, Jay Halfon](#), and the other being a [response from Tioga Energy Partners' legal counsel](#).

The first of these letters is dated July 27 and [may be found on Walter Hang's website for Toxic Targeting](#), the consulting firm the Rockefeller and Park families have, through Jay Halfon and the Sustainable Markets Foundation, given over \$1 million to help organize campaigns such as this one. The signatory organizations largely consist of a group of fronts financed by the Park and Rockefeller families and include the following:

Signer	Funder
<b>Adirondack Mountain Club</b>	Closely affiliated with Adirondack Council, Inc., funded by Park Foundation
<b>Catskill Mountainkeeper</b>	Funded by Park Foundation and closely tied to Rockefeller family
<b>Citizens Campaign for the Environment</b>	Funded by Park Foundation
<b>EarthJustice</b>	Funded by Park Foundation
<b>Earthworks</b>	Funded by Park Foundation and closely aligned with Rockefeller/Park funded Sustainable Markets Foundation
<b>Environmental Advocates of New York</b>	Funded by Park Foundation
<b>Frack Action</b>	Funded by Park Foundation
<b>Food &amp; Water Watch</b>	Funded by Park Foundation
<b>Natural Resources Defense Council (NRDC)</b>	Funded by Park Foundation and created by Rockefeller family
<b>New York Public Interest Research Group (NY-PIRG)</b>	Funded by Park Foundation and closely aligned with Rockefeller/Park funded Sustainable Markets Foundation
<b>Riverkeeper</b>	Closely affiliated with Waterkeeper Alliance, funded by Park Foundation and Rockefeller family
<b>Sierra Club</b>	Funded by Rockefeller family

This collection of Park/Rockefeller front groups sent a letter to DEC this week (that attached an earlier letter from 2012) demagoguing against waterless fracking. Their arguments reveal the fractivist campaign isn't about water at all but, rather, an irrational ideological hatred of fossil fuels combined with a desire to turn great chunks of Upstate New York into a private preserve for the wealthy ("make a wilderness") extending from the Catskills to the Adirondacks. One need not look beyond list of groups itself to see this. There is no economically viable shale gas in the Adirondacks or the Hudson River Valley, for example, and their recruitment to the cause demonstrates the cause is not anti-fracking but anti-development.

Nothing so much reveals the real purpose of this fractivist campaign, in fact, as the pitiful arguments set forth by the group against waterless fracking, all of which have been completely rebutted by Attorney Adam J. Schultz, who represents Tioga Energy Partners, LLC, the company that has applied to the DEC for a permit to pursue waterless fracking in Tioga County. Here are the most important excerpts:

*Contrary to AMC's pure conjecture about the known and unknown effects of waterless propane hydraulic fracturing, the benefits of using propane instead of large volumes of water for well stimulation are well known. These benefits are discussed, among other places, in the recently completed FSSEIS (Chapter 9.3) as well as in TEP's application. A copy of the summary of benefits contained in the application is attached for your convenience. AMC's hyperbolic reference to "two major explosions" during the use of waterless propane fracturing is simply inaccurate. One referenced incident did not even involve GasFrac.*

*There was a fire (not an explosion) at a well site where waterless propane fracturing was to be conducted, but had not yet started. The fire was caused by poor operating procedure by a third party who incorrectly opened the main valve on the wellhead, which allowed gas to escape from the well and the gas ignited. This incident had nothing to do with GasFrac operations or the use of propane for well stimulation.*

*Nonetheless, in response to this incident GasFrac implemented a wellhead lockout procedure requiring the placement of chains on the wellhead valves with different-colored locks. Each company involved with anything attached to the wellhead is provided a key to its lock, and when it is time to open the wellhead, each company removes its lock with GasFrac being the final lock removed before the wellhead can be opened.*

*The second incident involved GasFrac employees who did not follow established procedures. In this incident, after a leak from a pump had been detected by the on-site LEL monitors, emergency shutdown procedures were implemented. Three employees failed to proceed to the safe muster point as required. When these employees moved toward the pump, a fire occurred and some suffered burns. GasFrac immediately suspended operations until a thorough investigation had been completed. Based on the findings of the investigation, GasFrac increased the number of LELs it uses on site so that nearly every piece of equipment has its own LEL monitor and instituted the use of infrared cameras as part of its safety program. In addition, a "hard marked" hot zone was established with a zero tolerance policy on entering the hot zone during fracturing operations. Since these protocols and changes were implemented five years ago, there have been no incidents related to the GasFrac process.*

*AMC's wild claims about chemical additives and secret information are simply false. There are only three (3) chemical additives used in waterless propane hydraulic fracturing fluid. TEP will make a complete disclosure of this information to DEC as part of the application process.*

*Finally, while AIVIC wants to tell a tale that waterless propane hydraulic fracturing is new and unknown, and therefore scary, the fact is that this stimulation technology has been used successfully to stimulate over 2,600 zones at more than 800 well sites in North America.*

*As seen from the above and review of the extensive information submitted in support of the TEP applications, AMC's opposition is based on nothing but innuendo, conjecture, speculation and deliberate misinformation. It is, in short, baseless. While we understand that AMC and others may be opposed to TEP's applications, we cannot allow unfounded, unsupported and unsupportable statements to go unanswered. We will continue to respond to these types of comments as necessary.*

The letter also includes the excerpt from the Final Supplemental Generic Environmental Impact Statement recently issued by DEC in regard to fracking.

**Final SGEIS 2015, Page 9-9 – 9-10:**

**Liquefied Petroleum Gas (LPG) alternative –**

*The use of LPG, consisting primarily of propane, has the advantages of carbon dioxide and nitrogen cited above; additionally, LPG is known to be a good carrier of proppant due to the higher viscosity of propane gel [55]. Further, mixing LPG with natural gas does not 'contaminate' natural gas; and the mixture may be flowed directly into a gas pipeline and separated at the gas plant and recycled [55]. LPG's high volatility, low weight, and high recovery potential make it a good fracturing agent. Use of LPG as a hydraulic fracturing fluid also inhibits formation damage which can occur during hydraulic fracturing with conventional fluids. Using propane not only minimizes formation damage, but also eliminates the need to source water for hydraulic fracturing, recover flowback fluids to the surface and dispose of the flowback fluids. 559 As a result of the elimination of hydraulic fracturing source water, truck traffic to and from the wellsite would be greatly reduced. In addition, since LPG is less reactive with the formation matrix, it is therefore less likely to mobilize constituents which could increase NORM levels in the flowback fluid. LPG is discussed and addressed in the 1992 GEIS in the context of the permitting of underground gas storage wells and facilities in the State. Currently, there are three operating underground LPG storage facilities and associated wells for the injection and withdrawal of LPG, with a total storage capacity of approximately 150 million gallons of LPG. It is quite possible that these storage facilities which are located in Cortland, Schuyler and Steuben Counties could supply the LPG needed to conduct hydraulic fracturing operations at wells targeting the Marcellus Shale and other low-permeability gas reservoirs should a well operator make such a proposal for the Department's approval.*

*Well applications that specify and propose the use of LPG as the primary carrier fluid will be reviewed and permitted pursuant to the 1992 GEIS and Findings Statement. Horizontal and directional wells, which are part of the main subject of this SGEIS, are already in use in the Marcellus Shale. While these drilling techniques require larger quantities of water and additives per well because of the relatively longer target interval, horizontal and directional wells are considered to be more environmentally-friendly because these types of wells provide access to a larger volume of gas/oil than a typical vertical well.*

That's pretty straightforward isn't it? The letter also includes a nice summary of the benefits of waterless fracking:

**NO WATER REQUIRED**

- No water sourcing is required because the technology does not require the use of any water.
- No flowback water disposal is required because the technology does not require the use of any water.

**LESS TRUCK TRAFFIC**

- There is an approximately 50% reduction in the volume of truck traffic associated with the use of LPG due to the lower volume of propane (versus water) needed to complete the well stimulation.
- Propane is available locally.

- The propane is transported in the same types of trucks that have been safely delivering propane for residential and commercial uses for decades.
- Propane deliveries are made only during daylight hours.

**LPG IS MORE EFFECTIVE**

- LPG is a more effective carrier of proppant (sand) based upon its ability to hold the sand in suspension for longer periods of time. This results in more sand entering and remaining in the rock fractures.
- The greater number of fractures that remain open results in a better rate of resource recovery.
- Increased productivity results in fewer wells needed to recover the same volume of natural gas which reduces surface impacts.

**LPG IS NON-REACTIVE AND RECYCLABLE**

- LPG (unlike water) does not react with the formation. This prevents the transport of minerals or salts to the surface during the flowback phase.
- LPG minimizes formation damage that would occur with the use of high volumes of water.
- The recovered LPG is suitable for reuse in residential, commercial or industrial applications.

**ADDITIONAL BENEFITS**

- Flaring occurs only for a brief period at the end of each stimulation day (approximately 10 days).
- Hydraulic fracturing additives arrive and are stored in self-contained, covered trailers.
- Additives remain in the self-contained, covered trailers until they are dispensed directly into the mixing unit.
- The self-contained, covered trailers also serve as secondary-containment with a drip proof containment system.
- No dust is associated with the delivery, storage or use of proppant. All systems are enclosed.
- Use of LPG eliminates the need for the biocides present in a water based system.

The Park and Rockefeller minions are, of course, against it precisely because of these benefits – they don't want any type of natural gas development because it makes "making a wilderness" that much harder and that's what this is all about. Thank goodness the Tioga County folks are fighting back against the pastoral poverty these wealthy families would impose on them.



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