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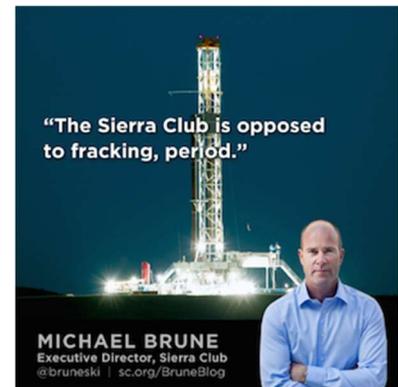
February 9, 2022

Dear elected officials, policymakers and regulators,

Recently, the Sierra Club supported an “analysis” produced by another anti-fracking group called Physicians for Social Responsibility (PSR). The analysis, titled “*Fracking with ‘Forever Chemicals’ in Colorado*” insinuates that PFAS is being used in Colorado hydraulic fracturing operations and that companies that fail to disclose trade secrets or proprietary information *might* be hiding other uses of PFAS. The report was heavy on misinformation and fear-mongering that has made its way into a couple Colorado media outlets. Our aim with this letter is to set the record straight.

First, the motivation of this report is important. The Sierra Club and PSR are committed to stopping fracking, and thus oil and natural gas development, in Colorado and the United States. It’s no surprise the final recommendation from the “analysis” states, “Limit or ban drilling and fracking.”

Second, the report fails to identify actual PFAS from operators who disclose the chemicals used on their locations via FracFocus.org, a website run by the Groundwater Protection Council and the Interstate Oil and Gas Compact Commission (IOGCC). The report’s authors, who are not physicians despite the name of the group, hang their entire analysis on the identification of PTFE in the FracFocus registry. But, as [Colorado Public Radio](#) rightly points out, “PTFE is considered a stable compound that presents little risk under normal conditions.” The authors say that PTFE *could* breakdown into PFAS as a result of the fracking process but fail to confirm this important insinuation.



Third, the authors claim that surfactants companies use and disclose on the FracFocus registry *could* also be examples of PFAS. Again, the authors suggest this without any evidence. As Associate Professor of Chemistry at the Colorado School of Mines Shubham Vyas told [9 News](#), surfactants are commonplace in our daily lives. “A lot of PFAS compounds are surfactants. We use surfactants all the time for all different kind of applications. To create foams. To clean dirty clothes. To wash our hands. We have surfactants all around us, but a lot of PFASs are also surfactants. We don’t use PFAS surfactants in our soap. We don’t use them in our laundry. Those are different surfactants that nature can actually break.” Again, the insinuation is that PFAS *might* be in fracking operations and that’s wrong.

Without evidence, the authors claim these chemicals used as part of the energy development process pose a risk to Colorado’s water supply. But the Colorado Water Quality Control division says it has no

evidence this has occurred. According to a response to [The Denver Post](#), “The state Water Quality Control Division isn’t aware of any impact to drinking water from PFAS potentially used in fracking, spokeswoman Erin Garcia said. The division sampled 400 water systems in 2020 for PFAS and none of the water tested above the federal advisory level, she said in an email.”

Neither the state nor the EPA have ever found an instance of the process of fracking contaminating groundwater in Colorado. In Colorado, at least two layers of waterproof cement and steel casing are required around the production tubing to separate the wellbore from aquifers. This provides stability during drilling operations and significant groundwater protection. Fracking typically takes place a mile below the surface, most groundwater is about 100 feet below the surface.

Finally, the purchase of PFAS is no longer permitted in Colorado, and two important bills were passed in 2020 that gave resources to the state to better understand when and where PFAS is used. [HB 1119](#) expanded the state’s authority to regulate PFAS, including the establishment of a registration program to make sure existing PFAS products are clearly identified and tracked. And, [SB 218](#) established a new fee of \$25 per truckload for every manufacturer of fuel products, with funds going to support PFAS oversight and a PFAS buyback program. We asked our members about these bills when they were being considered and no one opposed, as they have been moving away from using PFAS in their firefighting suppressants in coordination with local fire departments where they operate.

The men and women of Colorado oil and natural gas industry have made great strides and improvements to develop among the cleanest molecules in the world. These professional engineers, scientists, environmentalists and more have refined our process to be among the most protective of our water, our air and our land. This misinformation does a disservice to their work and the people of Colorado.

If you have additional questions about Colorado’s first in class operations, please reach out to us to learn more.

Thank you.

Dan Haley, President and CEO

