

February 19, 2018

To the Honorable Senator Miner, Representative Kennedy, Representative, Demicco and distinguished members of the Environment Committee:

RE: Testimony for Senate Bill 103 "An Act Concerning Hydraulic Fracturing Waste in CT"

I am a concerned citizen living in Manchester, CT who writes to ask you to permanently ban toxic, radioactive waste in our beautiful state of Connecticut. Our environment, health, property values, town and state budgets cannot afford the accidents, spills, leaks and inadequate treatment followed by discharge that are contaminating other states. There are thousands of spills in other states with regulations and waterways are already radioactive. We need to ban this waste in CT so we don't face the same contamination problems here.

As you know the 2018 Senate Bill 103 "An Act Concerning Hydraulic Fracturing Waste in Connecticut" proposes to ban waste from one process, hydraulic fracturing, and from gas wells only. Public Act 14-200 language prohibits hydraulic fracturing waste, and other substances used for or generated secondarily to the purpose of hydraulic fracturing...the process of pumping a fluid to fracture rock.

This is defined in Section 1(a)(4) and Section 1(a)(10). The wording "generated secondarily to the purpose of hydraulic fracturing" is ambiguous. It doesn't appear to include the wastes coming from the drilling process, which happens before hydraulic fracturing takes place. It is unclear if wastes produced years after hydraulic fracturing is completed, or during the gas dehydration process is included.

In response, CT towns are passing more comprehensive and better-defined language. Numerous types of wastes are mentioned in Section 1(a)(10), but what is missing in the definitions are the additional processes that also produce these wastes during the entire drilling and extraction lifecycle.

This includes the:

1. drilling process which produces drill cuttings, muds and toxic liquids that leach from these solid wastes,
2. production process and dehydration process which produce brine, also called "produced water," and
3. storage process of gas & LPG which includes "fallout" brine. Also, not included are any wastes from oil wells, as Sec 1(a)(4) only refers to the hydraulic fracturing process used for gas.

I appreciate your kind attention to this very serious matter.

Respectfully submitted,
Barbara Vizoyan
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