



EARTHJUSTICE

RIVERKEEPER



December 30, 2009

Attn: dSGEIS Comments
Bureau of Oil & Gas Regulation
NYSDEC Division of Mineral Resources
625 Broadway, Third Floor
Albany, New York 12233-6500

Re: **Comments on the Draft Supplemental Generic Environmental Impact Statement on the Oil, Gas, and Solution Mining Regulatory Program**

To Whom It May Concern:


The undersigned organizations hereby submit their joint comments on the Draft Supplemental Generic Environmental Impact Statement on the Oil, Gas, and Solution Mining Regulatory Program. The comments appear in the enclosed technical memorandum prepared by AKRF, Inc. and the following attachments thereto:


- Attachment A: Data Sets Needed for Analysis
- Attachment B: Table of Adherence of the DSGEIS to the Final Scope of Work
- Attachment C: Harvey Consulting, LLC. *Review of DSGEIS and Identification of Best Technology and Best Practice Recommendations*
- Attachment D: Harvey Consulting, LLC. *New York State (NYS) Casing Regulation Recommendations*
- Attachment E: Tom Myers, Ph.D., *Technical Memorandum*
- Attachment F: Glenn Miller, Ph.D., *Toxicity and Exposure to Substances in Fracturing Fluids and in the Groundwater Associated with the Hydrocarbon-bearing Shale*
- Attachment G: CEA Engineers, P.C.
- Attachment H: Air Quality Memorandum to Marcellus Shale Files
- Attachment I: Noise Screen


Comments specific to some of the organizations will be submitted under separate cover.

Respectfully,


Kate Sinding
Natural Resources
Defense Council


Deborah Goldberg
Earthjustice


James Simpson
Riverkeeper


Ramsay Adams
Catskill Mountainkeeper