

From: [Linea .Sundstrom](#)
To: [Sciretta, Nicholas](#)
Subject: written statement regarding Dewey-Burdock project
Date: Monday, August 18, 2014 11:04:39 PM

Hon. William J. Froehlich:

My concern relates directly to Contention 3, that the FSEIS Fails to Include Adequate Hydrogeological Information to Demonstrate Ability to Contain Fluid Migration and Assess Potential Impacts to Groundwater.

While the FSEIS addresses the basic scenario of containment of contaminated water in the absence of seismic activity and separately discusses the presence of the Dewey geological fault approximately one mile from the proposed project area, it is my contention that the document does not adequately, or in any manner, address the reasonably foreseeable event of eventual hydraulic fracturing taking place in the immediate area and generating increased seismic activity. The role of fracking in generating earthquakes is now well documented for portions of Ohio and Oklahoma, although the exact geological mechanisms of this are not yet well understood. The Dewey-Burdock project lies within an oil and gas field, and one can reasonably anticipate use of fracking here in the future to extract those resources. The Dewey Fault is currently active, as evidenced by an earthquake that occurred along the northeastern end of the fault last December, approximately three miles east of the town of Custer. With a vertical displacement of 250 feet, an earthquake along this fault has the potential of opening channels between the various aquifers that would allow contaminated water to enter the Minnelusa and Madison aquifers. For example, two of the confining units, the Morrison Formation and the Skull Creek Shale, are less than 200 feet thick.

I would like to see this possibility specifically addressed in the EIS rather than being ignored. This groundwater source is absolutely necessary for civic and agricultural use in the region. If the combination of the close proximity of the Dewey Fault, the likelihood of future fracking, and the permeability and tensile strength of the rock are such that contamination of groundwater cannot happen, please explain why not.

Respectfully,

Linea Sundstrom

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