

Arkansas Wildlife Federation • Catskill Mountainkeeper • Chemung County Council of Churches
• Chemung County Council of Women • Church Women United of Chemung County • Church
Women United of New York State • Clark Resource Council • Court St Joseph #139 Catholic
Daughters of the Americas, Corning/Elmira • Damascus Citizens for Sustainability • Delaware
Riverkeeper • Drilling Mora County • Earthjustice • Earthworks' Oil and Gas Accountability
Project • EcoFlight • Environmental Working Group • Ladies of Charity of Chemung County •
National Alliance for Drilling Reform • Natural Resources Defense Council • New Mexico
Wildlife Federation • Northeast Ohio Gas Accountability Project • Northern Plains Resource
Council • Otsego 2000, Inc. • NYH20 • Past Regents Club/Catholic Daughters of the Americas,
Diocese of Rochester • Pavillion Area Concerned Citizens • People for a Healthy Environment •
Pomona Grange #1, Chemung County • Powder River Basin Resource Council • Red Rock
Forests • San Francisco Creek Ranch Landowners Association • Sierra Club • The Committee to
Preserve the Finger Lakes • The Endocrine Disruption Exchange • Upper Green River Alliance •
Veteran Grange #1108, Chemung County • Western Colorado Congress •
Wise County Alliance for Drilling Reform • Yell County Wildlife Federation

John A. O'Donnell
President
B.J. Services
4601 Westway Park Blvd.
Houston, TX 77041

August 5, 2010

Dear Mr. O'Donnell:

Upon reviewing the recently released results of a Congressional investigation, we were troubled to learn that your company had admitted to injecting diesel and a related contaminant in hydraulic fracturing operations in at least three states. The undersigned organizations collectively represent more than 625,000 members, some of whom live in communities that may have been placed at risk by these injections. We would like complete information about these injections so that citizens can protect themselves.

We are writing to request that you immediately disclose 1) where, when and into what formations these injections occurred, 2) the chemical make-up and volume of the product injected, by well, 3) whether prior to each injection, you conducted site-specific hydrogeological studies and transport modeling to identify the potential for migration of injected fluids or naturally occurring contaminants released underground as a result of hydraulic fracturing and, if so, the results of those studies, 4) whether you conducted any tests for evidence of migration of the fluids or contamination by these injections and, if so, the results of these tests, 5) whether you detected any other harm as a result of the injections, and 6) whether your company obtained permits to inject diesel pursuant to the Safe Drinking Water Act (SDWA) and, if so, copies of these permits.

Injecting diesel and related contaminants underground in hydraulic fracturing operations poses significant risks to water quality and human health. In a 2004 report on hydraulic fracturing, the Environmental Protection Agency (EPA) singled out diesel as a health concern, writing that "the use of diesel fuel in fracturing fluids poses the greatest

potential threat to [underground sources of drinking water] because the BTEX constituents in diesel fuel exceed the [maximum contaminant level] at the point of injection.” BTEX refers to benzene, toluene, ethylbenzene and xylene which are toxic in water at very low levels. Benzene is a contaminant of particular concern because it is a known human carcinogen.

According to the investigation by the House Committee on Oversight and Government Reform, your company reported that it used 1,706 gallons of diesel-based slurry in two dozen coalbed methane hydraulic fracturing jobs in Arkansas and Oklahoma in 2005, 2006 and 2007. Your counsel told the committee that these injections violated a memorandum of agreement that your company had signed with EPA promising not to inject diesel directly into underground sources of drinking water in coalbed methane formations. In addition, B.J. Services reported that it used 833 gallons of other fluids containing diesel to hydraulically fracture coalbed methane wells in Arkansas and Oklahoma in 2005, 2006 and 2007. Your company also disclosed that it used 217 gallons of a fluid containing xylene, one of the BTEX chemicals, to hydraulically fracture coalbed methane wells in three states in 2005, 2006, and 2007.

It is critical that you respond to our request for more specific information about these injections and alert the communities affected. Communities must know more about these activities so that they can conduct testing or take other precautions. Please let us know if you have any questions. We look forward to your prompt response. Please direct correspondence to the Arkansas Wildlife Federation and Environmental Working Group.

Sincerely,

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