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**U.S. House of Representatives**  
**Committee on Natural Resources**  
**Washington, DC 20515**

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September 6, 2013

The Honorable Jon Jarvis  
Director  
National Park Service  
1849 C Street NW  
Washington, DC 20240

Dear Director Jarvis,

I am writing in regards to comments recently submitted by the National Park Service (Service) to the Bureau of Land Management (BLM) on the proposed well stimulation and hydraulic fracturing rule on Federal and Indian lands. I am deeply disappointed at the quality of the Service's comments that were submitted and the data used to support the Service's conclusions.

According to the Service's policy on the Integrity of Scientific and Scholarly Activities, approved by you on September 19, 2012, Service employees are directed to "act in the interest of the advancement of science and scholarship for sound decision making, by using the most appropriate, best available, high quality scientific and scholarly data and information to support the mission of the [Service] and the Department." The policy also directs Service employees to "clearly differentiate among facts, personal opinions, assumptions, hypotheses, and professional judgment in reporting the results of scientific and scholarly activities and characterizing associated uncertainties in using those results for decision making."

The Service's comments to BLM are inconsistent with the scientific integrity policy in that they are not based on the best-available science, do not clearly differentiate between facts and opinions, and do not adequately characterize the uncertainty on which its scientific judgements are based.

The Service's comments rely on a *New York Times* opinion article from Cornell Professor Anthony Ingraffea regarding leakage rates from natural gas drilling. The opinion piece suggested that methane "leakage" rates from oil and gas development were as high as 17 percent. This claim has been widely criticized and disproved by independent scientists and other federal agencies.

University of Chicago climate scientist Dr. Raymond Pierrehumbert said this about Dr. Ingraffea's piece on methane leakage: "[W]hat Ingraffea is doing in continuing to claim that natural gas is as bad as coal is not a matter of looking at the same data as everybody else and drawing different

conclusions. It is more a matter of distorting science in order to support a preconceived political agenda.”<sup>1</sup>

The United State Environmental Protection Agency produced a report in 2013 that found methane emissions from natural gas systems have declined by 11% since 1990, even as natural gas production has grown substantially in our country<sup>2</sup>. The United States Department of Energy has also rejected much of Professor Ingraffea’s work on this matter.

As you are well aware, the federal government owns over 66% of the lands within Utah, including many National Parks managed by the Service. The state of Utah’s Division of Oil, Gas, and Mining has responsibly managed and regulated oil and natural gas development for decades in an environmentally responsible manner. The Division recently enacted a regulation requiring oil and gas companies to disclose which substances are used during the fracturing process. It is distressing to me that a taxpayer funded agency, such as the Service, would rely on information that other agencies within the Administration have discounted in official comments.

I respectfully request an answer to the following questions no later than October 15, 2013:

1. What are the National Park Service, Department of Interior, and the Obama Administration’s protocol for quoting editorials and news articles in official comments? Please explain how the Service’s reliance on this opinion column is consistent with the 2012 scientific integrity policy.
2. Did you personally review the Service’s comments before official submission? Were you advised about the scientific uncertainty associated with the Ingraffea opinion column? If yes, please provide copies of all documents used to brief Service officials about the comments, including the Service’s decision to base its comments on the Ingraffea column.
3. Did other federal agencies or Departments, such as the Office of Management and Budget, review the Service’s comments? Please provide any and all documentation between Service employees the other federal agencies, departments, or official as they relate to the official comments.
4. Does the Service plan to withdraw these comments given the inaccurate statements and data the Service used to make assumptions and conclusions?
5. How does the Service plan to rely on sound scientific for future official comments?

Thank you for your help in this matter.

Sincerely,



Rob Bishop  
Chairman

Subcommittee on Public Lands and Environmental Regulation

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<sup>1</sup> Quoted by Andrew Revkin, “Two Climate Analysts Fault Gas Leaks, but Not as a Big Warming Threat,” *New York Times*, August 2013.

<sup>2</sup> Kevin Begos, “EPA methane report further divides fracking camps,” *Associated Press*, April 28, 2013.