



September 15, 2026

Dr. Joylette Portlock, PhD, Chair
Allegheny County Board of Health
c/o Allegheny County Health Department
542 Fourth Avenue
Pittsburgh, PA 15219

Dear Dr. Portlock:

Please accept these comments on behalf of the Marcellus Shale Coalition regarding the Board of Health's consideration of certain recommendations from the "Fracking" Committee. The Marcellus Shale Coalition is a statewide trade association representing the unconventional natural gas industry, and is headquartered in Robinson Township, right here in Allegheny County.

I had intended to appear before the Board of Health in person to share these comments. Unfortunately, that is not possible given the Board's limitation of public comments at its public meeting, coupled with the lack of sufficient notice of the Board's agenda.

As of now, we know nothing regarding the substance of any recommendations which may be presented by the Fracking Committee and voted on by the Board of Health. This, in itself, should be concerning to all interested parties.

On August 20th, I shared a letter with you and the Board of Health outlining concerns with the process being utilized by the Fracking Committee. Its chair belongs to an organization that has been openly hostile to natural gas development in the Commonwealth, and which has perpetuated misinformation and discredited studies regarding the impact – or lack thereof – of industry operations in Pennsylvania. The lack of transparency of the Committee's work – coupled with a lack of desire to engage with any representatives of industry to inform this work and understanding – reflects poorly on any effort to engage in responsibly public policy making.

I enclose a copy of my August 20th letter and incorporate it as part of these comments.

The limited information we do know that the Board of Health has received is due only to Right to Know Law information, which unfortunately the Allegheny County Department of Health sought to contest and conceal from the public. Among this information is a submission of purported public health studies seeking to correlate certain health outcomes with natural gas development.

Among the studies referenced and relied upon are those conducted by the University of Pittsburgh in 2023.

Yet, the actual study results from the University of Pittsburgh do not substantiate the misleading conclusions contained in the summation prepared by the Fracking Committee. I encourage you to review the enclosed "University of Pittsburgh Health Studies" fact sheet for accurate information regarding these findings and the limitations of the referenced studies. The work of the University of Pittsburgh should give significant pause to anyone concerned about the rigor of academic research on public health matters – and yet, even with these shortcomings, the researchers could not identify quantifiable data to justify their desired outcomes.

Speaking broadly regarding public health studies that seek to confuse the public by conflating "correlation" with "causation", I encourage you to take into consideration the following quote from Dr. Ned Ketyer, President of Physicians for Social Responsibility:

"None of the studies are saying it's fracking that's causing [health ailments]...these studies are not designed to prove causation." ~ Dr. Ned Ketyer

PA House Environmental and Natural Resources Committee Hearing, November 17, 2025

As the Board of Health contemplates any information and recommendations shared by the Fracking Committee, I reiterate the following:

- Unconventional natural gas development is well regulated in Pennsylvania, with strong protections to safeguard water quality, air quality, public health, and the communities in which we operate.
- The employees of this industry are your constituents. Many of them live and work here in Allegheny County. They have just as much of a vested interest in operating responsibly as anyone and take great pride in their work that ensures this happens each and every day.
- The state is the primary regulator of natural gas development, and the Board is strongly encouraged to familiarize itself with state law and regulations that are already in place. Many of these are referenced in my August 20th letter.
- Allegheny County residents have and continue to benefit from natural gas development. In addition to millions of dollars in royalty payments to landowners – including Allegheny County itself – more than \$61 million in Impact Fee payments have been distributed to county, municipal governments and non-profit organizations.
- Allegheny County air quality has improved – dramatically – thanks to the increased utilization of natural gas, particularly in the electric power generation sector.



- The shale gas industry maintains a 98% environmental compliance rate, perhaps the highest of any industry in Pennsylvania.
- Credible, peer-reviewed studies have consistently demonstrated that natural gas operations are being conducted in a manner that is protective of public health and the environment. I enclose a fact sheet highlighting many of these studies and findings.

On behalf of our member companies and their employees, we would welcome the opportunity to meet with the Board and provide any information necessary to inform you in your deliberations on this matter.

Respectfully submitted:

Jim Welty, President
Marcellus Shale Coalition

Enclosures





August 20, 2026

**Dr. Joylette Portlock, PhD, Chair
Allegheny County Board of Health
c/o Allegheny County Health Department
542 Fourth Avenue
Pittsburgh, PA 15219**

Dear Dr. Portlock:

On behalf of the Marcellus Shale Coalition (MSC), an Allegheny County-based trade group representing the unconventional natural gas industry in Pennsylvania, I write regarding the Board of Health's (Board) potential consideration of recommendations impacting natural gas industry operations in the county.

The MSC and our operators are concerned about the activities of a "Fracking Committee" under the Board that has conducted a series of under the radar meetings to develop recommendations on how and whether natural gas can continue to be developed within the county. The Committee's process to date has lacked transparency, balance, and any collaboration with an industry that has a significant economic presence and supports thousands of workers in Allegheny County. It is our understanding that the Fracking Committee has met for nearly a year – often without sunshining meetings, posting agendas, or keeping minutes of its meetings, according to the assistant solicitor for the Allegheny County Health Department.

Indeed, the committee's leadership and composition raise legitimate questions about whether a balanced range of perspectives has been meaningfully considered, thereby calling into question any recommendations that are advanced.

It is imperative to understand that natural gas development in the Commonwealth – and Allegheny County – is subject to among the strictest environmental and public health standards in the nation. Pennsylvania's statutes and regulations have served as a model for many other states with shale gas development. These include, at a minimum, requirements related to:

- Permit notification to affected landowners and municipal governments**
- Access road and well pad construction, including stormwater management**
- Well construction, including multiple layers of casing and cement, to protect water supplies**
- Strict well setback distance requirements from water wells, drinking water supplies, buildings, streams and other waterways (the strictest setback distances of any major natural gas producing state in the nation)**

- Strict well completion disclosure and reporting requirements related to hydraulic fracturing
- Air quality standards, including permitting requirements above established thresholds

Further, numerous scientific air and water quality data collection efforts continue to demonstrate that natural gas development is occurring in a manner that is protective of public health and the environment. To underscore this point, I am providing supporting documentation and verified data from operators currently active in Allegheny County.

The enclosed information demonstrates that industry operations are conducted to meet and even go beyond applicable federal health-based standards and are aligned with regional background air quality – showing natural gas operations do not impact regional background air quality. All this data is publicly available online and continues to be collected and published online in near real-time – including for sites in Allegheny County.

In addition to the attached data, CNX Resources provides publicly accessible, [real-time air quality monitoring data](#) from its operating sites, which likewise demonstrates that emissions remain below federal health-based standards and that natural gas development is being conducted in a manner that is protective of public health. Taken together, this data provides real-world, site-specific evidence that contradicts claims of adverse air quality impacts from responsible natural gas development.

Importantly, these findings are consistent with the Allegheny County Health Department's own air data from its Deer Lakes monitoring program. This effort found VOC concentrations to be consistently low throughout all phases of natural gas development, showing no adverse air quality impacts or exceedances of federal health-based standards attributable to natural gas development. While that information has, ironically, been removed from the Allegheny County Department of Health's website, I encourage you to review it, as well.

As natural gas development in the region supplies the energy for electricity generation, displacing coal, emissions of SO₂, NO_x, and particulate matter have declined dramatically, contributing to cleaner air across the region. Over the past two decades, power sector emissions of these pollutants have fallen by more than 90% in Allegheny County, while Pennsylvania's energy-related CO₂ emissions have declined by 46%. Statewide, the emission reductions equate to \$450 billion - \$1 trillion in public health benefits for Pennsylvania residents.

Indeed, Allegheny County's own long-term monitoring also shows county PM_{2.5} concentrations have fallen by approximately 40–60%, with every monitoring site meeting the U.S. EPA's current annual standard in the latest available date from 2024. We applaud the public and private partnerships that made this progress possible and remain engaged on how to sustain this progress.



Beyond air quality, Allegheny County also has in its possession comprehensive water quality monitoring data related to natural gas development in the county. As part of the development of the Deer Lakes lease, Allegheny County has received nearly 21,000 data points covering 44 analytes sampled 48 times at 10 different waterways over the past 12 years. This data shows that the monitoring locations exhibit water quality that tracks seasonal variation of regional waterways and water quality characteristics that are well within accepted water quality standards. In many cases, the water quality sampling exhibits water quality results that meet public drinking water standards – despite the fact these natural waterways are not public drinking water sources.

In closing, the MSC is deeply concerned by the committee's lack of transparency. We respectfully encourage the Board to discontinue the work of the committee and to review the scientific facts available to and already in possession of the county. After more than two decades of unconventional natural gas development in the region, an extensive body of scientific research and monitoring has consistently shown no evidence of impact on regional air quality or drinking water from natural gas operations. Protecting public health and responsibly developing natural resources are not competing priorities, they are shared responsibilities. By continuing to rely on sound science, transparency, and collaboration, we can advance both for the benefit of all Allegheny County residents.

Thank you for your review and attention to this important matter.

Sincerely,



Jim Welty
President

cc: The Honorable Sara Innamorato, Allegheny County Executive



University of Pittsburgh Health Studies

Overview

In December 2020, the Wolf Administration provided a \$2.58 million, no-bid contract to the University of Pittsburgh (Pitt) aimed at correlating public health issues with unconventional natural gas development. Pitt looked at three specific issues – childhood cancer, asthma and birth outcomes – within an eight-county region of southwestern Pennsylvania. The studies were released publicly in August 2023.

Pitt conducted an observational study that consisted of examining written health records and conducting a limited number of interviews. The majority of funds (94%) went to researcher salaries, benefits and administrative overhead costs. No new research was conducted, and Pitt researchers refused invitations to visit natural gas sites or speak directly with industry experts.

Despite these and other shortcomings, Pitt researchers failed to establish any causal link between natural gas development and adverse health impacts. Below are key takeaways from each of these studies.

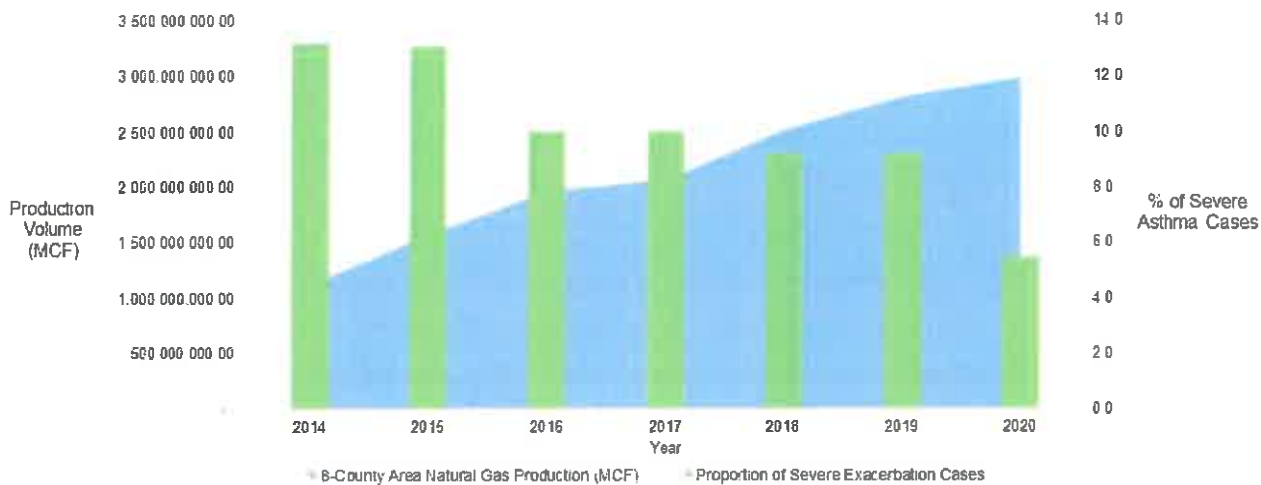
Childhood Cancer

- *“No evidence was found to support an association between exposures to [natural gas] activities and other environmental factors and the risk of leukemia, [central nervous system] tumors, and malignant bone tumors, including [Ewing’s Family of Tumors],”* said Pitt researchers.
- Association with lymphoma was extremely low and underscores the limits of the studies’ methodologies:
 - Assumed people do not move from their residence at birth.
 - Failed to consider smoking status, prenatal care and other genetic/lifestyle factors.
 - Failed to identify the age of diagnosis or associate time of diagnosis with any known exposures.
 - Estimated risk of lymphoma remains extremely low: 0.006% - 0.0084%.

Asthma

- Pitt researchers deviated from accepted standards in medical studies and categorized all asthma cases as ‘severe’, despite many such cases meeting the accepted definitions of either ‘mild’ or ‘moderate’. The American Thoracic Society estimates that between 5-10% of asthmatics have a ‘severe’ case, yet Pitt’s study estimated this percentage at around 40% - a clear deviation from commonly held medical understandings of asthma.
- Despite the researchers suggesting that residents in proximity to natural gas production were more likely to suffer from a severe asthma attack, their data demonstrates otherwise.
- In fact, between 2014–2020 severe asthma cases in the study region *declined by over 50%*, despite natural gas production *increasing by over 200%* in the study region.

8-County Area Gas Production vs. Distribution of Severe Asthma Exacerbation Cases in Pitt Study, 2014-2020



Birth Outcomes

- Researchers identified no specific adverse birth outcomes related to natural gas development.
- Lower birthweights (3400 grams) identified in the study region were still well within the national average of 2400 – 4000 grams and “pose little health risk”.
- Common causes of low birthweight, such as smoking or alcohol consumption, were not factored into the study.
- Researchers suggested that fine particulate matter in the air *may* have been a causal exposure pathway, yet state and federal environmental data shows that particulate matter concentrations actually *declined* in the region during the study period.
- Pitt’s data showed that the odds of a pre-term birth were actually *higher* for those living with no natural gas activity near the mother’s residence during pregnancy.

Where Can I Learn More?

To learn more, please visit www.marcelluscoalition.org/resources/healthstudies or click on any of the following links:

- [MSC Letter to PA General Assembly](#)
- [Very Little Correlation & No Causation in Pitt Health Studies](#)
- [Pitt Studies Contain Serious Methodological Flaws](#)
- [Health & Environmental Impacts Studies Fact Sheet](#)

Health & Environmental Impacts Studies

Safe, Responsible Pennsylvania Natural Gas Development

Research confirms natural gas is safely and responsibly developed in Pennsylvania. It is a testament of the industry's commitment to excellence and willingness to work alongside regulators and other stakeholders to ensure we are providing the energy to power society while adhering to the highest of environmental standards.

Air Quality

As Pennsylvania is firmly positioned as America's second largest natural gas producing state, the abundance of this resource has helped reduce emissions within our borders and across the country.

- Air quality measurements were collected during all phases of natural gas development, including pad construction, drilling, completions, flowback and production phases.
 - “The results...show that emissions from responsible CNX natural gas development measured to date fell well below science based air quality standards that are designed to protect the public from negative health effects resulting from emissions of PM 2.5 and BTEX.”
[CNX Radical Transparency Assessment Report - August 14, 2024.](#)
- Appalachia – despite being the largest producer – has among the **lowest methane emission intensity of all major oil and natural gas basins in the country.**
[Benchmarking Methane and Other GHG Emissions of Oil & Natural Gas Production in the United States](#), Clean Air Task Force, Ceres (June 2021)
- Rystad Energy's analysis reveals CO2 emissions intensity levels in the Appalachian Basin are “best-in-class” in America. Rystad Energy's Scope 1 upstream emissions analysis shows Appalachia is the top region in the country, with 7.1 kg of CO2 per barrel of oil equivalent (boe) in 2020.
 - “Such a level of CO2 intensity performance **brings Appalachia to the top quartile among all oil and gas fields globally.** As the basin becomes more mature and modern ESG best practices are implemented, we anticipate Appalachia to improve further in its CO2 intensity dimension in the next three to four years.” – *Emily McClain, Sr. analyst, Rystad Energy*
[A gas boom is coming in the US: A closer look at Haynesville and Appalachia](#), Rystad Energy (April 2021)
- Pennsylvania had the highest absolute decline of energy-related CO2 emissions (42.4 MMt) of any other state from 1990 to 2018, resulting in a more than **16% reduction** over this time period.
[State Energy-Related CO2 Emissions by Year](#), Energy Information Administration (March 2021)
- “Our results clearly suggest that [natural gas] is a clean source of energy. And on top of that, we can suggest a lot of gas with a very low leakage overall from the infrastructure.” – Co-author Thomas Lauvaux during a 2017 Penn State [webinar](#) on the study.

Quantifying methane emissions from natural gas production in north-eastern Pennsylvania, Barkley et al. (2017)

- “All individual [volatile organic compound] concentrations in the monitored area were **well below health-protective levels.**”

Air monitoring of volatile organic compounds at relevant receptors during hydraulic fracturing operations in Washington County, Pennsylvania (2016)

- An ambient air monitoring program conducted by an independent third-party throughout all phases of development of a shale gas well site determined the data “**does not indicate that Augustine well pad air emissions contributed to elevated increases in long-term average concentrations of potential health concern for either particulate matter (PM 2.5) or the measured volatile organic compound (VOC) species.**”

Journal of Exposure Science and Environmental Epidemiology (December 2021)

Water Quality

Water is a key component to the unconventional natural gas development process, and numerous scientific studies have proven natural gas poses no threat to area water quantity or quality.

- “Natural gas development has had no discernable impact on water quality in the Susquehanna River Basin.”

Susquehanna River Basin Commission - Remote Water Quality Monitoring Network (June 2019)

- “Collectively, our observations suggest that [shale gas development] was an unlikely source of methane in our valley wells.”

Methane in groundwater before, during, and after hydraulic fracturing of the Marcellus Shale, Yale University (July 2018)

- “Based on consistent evidence from comprehensive testing, we found no indication of groundwater contamination over the three-year course of our study.”

Duke University Study (Commissioned by NRDC) (2017)

- “The most interesting thing we discovered was the groundwater chemistry in one of the area’s most heavily developed for shale gas – an area with 1400 new gas wells – **does not appear to be getting worse with time, and may even be getting better.**”

Bradford Co. water quality improves; impacts rare near shale gas wells, Pennsylvania State University (June 2018)

- “We found no relationship between CH₄ concentration or source in groundwater and proximity to active gas well sites.”

- “Our data do not indicate any intrusion of high conductivity fracking fluids as the number of fracking wells increased in the region.”

Monitoring concentration and isotopic composition of methane in groundwater in the Utica Shale hydraulic fracturing region of Ohio, University of Cincinnati (May 2018)

Public Health

As an industry deeply committed to protecting the health, safety and environment of our communities, we support fact-based and objective scientific research, and the data shows natural gas development is not a threat to community health and safety.

- “The drop in natural gas prices in the late 2000s, induced largely by the boom in shale gas production, **averted 11,000 winter deaths** per year in the US.”
Inexpensive Heating Reduces Winter Mortality, National Bureau of Economic Research (March 2019)
- “Studies tying shale development to negative public health impacts used imprecise measures, failed to consider other possible factors, and, in some cases, were poorly designed.”
Potential Human Health Effects Associated with Unconventional Oil and Gas Development: A Systematic Review of the Epidemiology Literature, Health Effects Institute (September 2019)
- “Overall, there are conflicting findings across studies resulting in either mixed or insufficient evidence of adverse birth outcomes associated with living near ONG operations during pregnancy.”
A Systematic Review of the Epidemiologic Literature Assessing Health Outcomes in Populations Living near Oil and Natural Gas Operations: Study Quality and Future Recommendations, Pa. Department of Health and the Colo. Department of Public Health & Environment (June 2019)
- “Incidence rates...were not consistently and statistically significantly higher than expected in all three time periods analyzed.” “EFOT incidence rates for both males and females were lower [in Washington County] than the rest of the state for all three time periods and were not statistically significant.”
 - “Childhood cancer incidence rates in the school district decreased during the last two time periods.”
 - *Ewing’s Family of Tumors, Childhood Cancer, and Radiation-Related Cancer Incidence Review for Washington County and Canon-McMillan School District in Pennsylvania*, Pennsylvania Department of Health (April 2019)
- “There is little potential for harm to workers or the public from radiation exposure due to oil and gas development.”
 - “There is little or limited potential for radiation exposure to the public and workers from the development, completion, production, transmission, processing, storage, and end use of natural gas.”
 - “There is little potential for radiation exposure to the public and workers from landfills receiving waste from the oil and gas industry.”
DEP Study Shows There is Little Potential for Radiation Exposure from Oil and Gas Development, Pennsylvania Department of Environmental Protection (2015)
- An average American is exposed to about 620 mrems/year; comparatively, exposure to workers at an oil and/or gas well site is expected to be less than 30 mrems. These exposure numbers “has not been shown to cause humans any harm.”
Doses in our Daily Lives, Nuclear Regulatory Commission