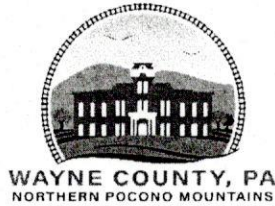


COMMISSIONERS OF WAYNE COUNTY

BRIAN W. SMITH, CHAIRMAN
Damascus Township, PA

WENDELL R. KAY
Honesdale Borough, PA

JOSEPH W. ADAMS
Salem Township, PA



VICKY J. BOTJER
Chief Clerk

LEE C. KRAUSE
Solicitor

JOINT WRITTEN SUBMISSION OF WAYNE ECONOMIC DEVELOPMENT CORPORATION

CHAMBER OF THE NORTHERN POCONOS and the WAYNE COUNTY COMMISSIONERS

Before the DELAWARE RIVER BASIN COMMISSION

March 27, 2018

"Injustice anywhere is a threat to justice everywhere".

Dr. Martin Luther King, Jr., Letter from the Birmingham Jail

Recently, the Delaware River Basin Commission (DRBC) announced that it would accept written comments regarding its' Revised Draft Hydraulic Fracturing Regulations. The Wayne Economic Development Corporation (WEDCO), The Chamber of the Northern Poconos (Chamber) and the Wayne County Commissioners (Commissioners) join together in these written comments in solidarity with each other and on behalf of the citizens of Wayne and Pike Counties, PA.

As Governor Tom Wolf recently observed, "Pennsylvania has a once-in-a-generation opportunity to develop and implement a strategy that will cultivate a manufacturing renaissance and transform our economy across the Commonwealth". This opportunity is, of course, the development of natural gas. In Northeast Pennsylvania this means the responsible use of the Marcellus Shale Formation.

This formation extends not only into the area regulated by the DRBC but also into the Susquehanna River Basin Commission's (SRBC) jurisdiction. Sensible, responsible development of this natural resource is allowed in the Susquehanna River Basin, but is not permitted in the Delaware River Basin. Besides the existence of the same geological formation in both river basins, there is at least one more prominent feature which their commissions share. Pennsylvania is a member of both the DRBC and SRBC. At present, Pennsylvania's governor, Tom Wolf, chairs each commission.

The 2016 Annual Report of the SRBC noted that "Through 2013, the Commission's monitoring programs have not detected discernible impacts on the quality of the Basin's water resources as a result of natural gas development, but continued vigilance is warranted." This report, which covers 2008-2013, found that "... the quantity of the Basin's water resources are sufficient in magnitude to accommodate the water demands of the industry concurrently with other water users operating within the Basin." Pennsylvania, it should be noted, voted with the majority of the SRBC in approving regulated water use in the Susquehanna River Basin for development of natural gas. So far,

COMMISSIONERS OF WAYNE COUNTY

Pennsylvania has not supported the same development in the Delaware River Basin, citing concerns that hydraulic fracturing will "... carry risks for groundwater and surface water resources." See p.8, DRBC posting, 1/8/18.

For many generations, Wayne and Pike County property owners have been excellent stewards of all of natural resources, including water and land. In 2013 the Wayne Conservation District, in cooperation with the US Geological Survey, conducted a baseline groundwater quality assessment to determine the status of Wayne County water resources. We believe that this demonstrates the County's continued commitment to water quality. According to Pennsylvania's Department of Environmental Protection (DEP), over 94% of Wayne County streams are designated as Special Protection Waters. This results from years of dedication and hard work by landowners, farmers, townships, the County and by DEP. Wayne County is committed to the high standards for our water which have only been achieved after much effort.

Any analysis of the current situation must consider the following factors:

- 1) The existence of the Marcellus Shale Formation and its' "... once-in-a-generation opportunity";
- 2) The safe, responsible development and regulation of that resource in the Susquehanna River Basin
- 3) The existence of the same natural resource in the Delaware River Basin as currently exist in the Susquehanna River Basin;
- 4) The prohibition of development in the Delaware River Basin of that same resource.

As noted earlier, both the DRBC and Pennsylvania express concerns about risks to groundwater and surface water which may be posed by hydraulic fracturing. Of course, this is the same method of extraction which has been in continuous use in the neighboring SRBC since 2008. The most recently available report of the SRBC shows no evidence of the risks which form at least a part of the DRBC's reluctance to approve this activity.

In fact, all Pennsylvanians repose trust in our state government and in the commissions it joins, to act wisely, prudently and in our best interests. Conversely, when state government follows conflicting policies, such as approving an activity in the Susquehanna River Basin while prohibiting the exact same activity in the Delaware River Basin, only confusion and distress can result. No reasonable person can think that Pennsylvania would allow the residents of the Susquehanna River Basin to knowingly be exposed to a risk involving their drinking water. This is why Pennsylvania allows hydraulic fracturing in the Susquehanna River Basin. No one will argue that that the value of a resource, or of a single human life, is more valuable in one basin than in the other.

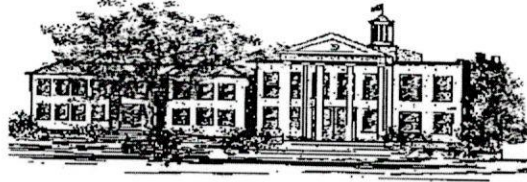
The only sensible thing, both for state government and for the DRBC to do, is to bring these opposing treatments of the same natural resource into harmony. This means allowing development in the Delaware River Basin. To do otherwise runs counter to every American value of fair play, consistency and the rule of law. Our collective sense of justice is eroded every time government takes an action which has no firm basis in fact or necessity. As Dr. King reminded us in 1963, "Injustice anywhere is a threat to justice everywhere."

Tioga County Commissioners

ROGER C. BUNN
COMMISSIONER

ERICK J. COOLIDGE
COMMISSIONER

MARK L. HAMILTON
COMMISSIONER



DEREK D. WILLIAMS
CHIEF CLERK

RAYMOND E. GINN, JR.
SOLICITOR

PHONE 570-723-8209
FAX 570-723-8206

Courthouse Annex 118 Main Street Wellsboro, PA 16901

March 29, 2018

To Whom It May Concern:

The Tioga County Board of Commissioners support the Wayne County Board of Commissioners in their effort to move forward with gas drilling and production in the Delaware Basin. We have experienced the evolution of the gas industry first hand within our own County and have not experienced any discernable degradation of our water. We believe a ban on hydraulic fracturing is completely unnecessary, and the oversight of the DEP is adequate.

The positive impacts of the gas industry have been widespread and the financial benefits to our County have allowed us to accomplish great things for our citizens. The gas industry has boosted economic development and has had a positive impact on many industries including agriculture. As Governor Wolf has stated, this truly is a "once in a lifetime opportunity." A permanent ban on hydraulic fracking will disenfranchise the residents and taxpayers of Wayne County.

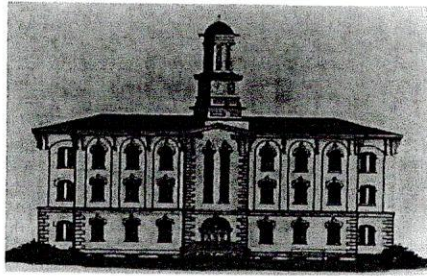
A handwritten signature in black ink, appearing to read "Erick J. Coolidge".

Erick J. Coolidge
Tioga County Commissioner

Thomas S. Henry
Chairman

Judy Kraft Mead

Ronald P. Williams



William Gaylord
Chief Clerk

Anthony P. Litwin III
Solicitor

Commissioners of Wyoming County
1 Courthouse Square
Tunkhannock, PA 18657

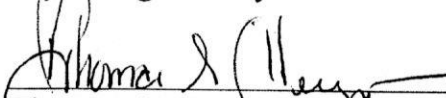
March 28, 2018

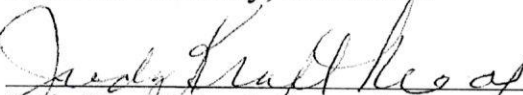
To Whom It May Concern:

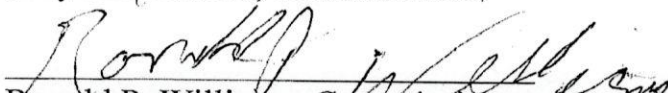
We, the Board of Commissioners of Wyoming County support the Wayne County Board of Commissioners in their effort to move forward with gas drilling and production in the Delaware Basin. We have experienced the evolution of the gas industry first hand within our own County and have not experienced any discernable degradation of our water. We believe a ban on hydraulic fracturing is completely unnecessary, and the oversight of the DEP is adequate.

The positive impacts of the gas industry have been widespread and the financial benefits to our County have allowed us to accomplish great things for our citizens. The gas industry has boosted economic development and has had a positive impact on many industries including agriculture. As Governor Wolfe has stated this truly is a "once in a lifetime opportunity". A permanent ban on hydraulic fracking will disenfranchise the residents and taxpayers of Wayne County.

Wyoming County Commissioners


Thomas S. Henry, Chairman


Judy Kraft Mead, Commissioner


Ronald P. Williams, Commissioner

SUSQUEHANNA COUNTY COMMISSIONERS

Alan M. Hall, Chairman
Elizabeth M. Arnold, Vice Chairman
MaryAnn Warren, Commissioner

570-278-4600 (Phone)
570-278-9268 (Fax)



Martin J. Kane, Chief Clerk
Michael J. Giangrieco, Solicitor

PO Box 218
31 Lake Ave.
Montrose, PA 18801

March 29, 2018

Secretary Pam Bush
DRBC
PO Box 7360
West Trenton, NJ 08628

Dear Secretary Bush,

We, the Board of Commissioners of Susquehanna County, Pennsylvania support the Wayne County Board of Commissioners in their effort to move forward with gas drilling and production in the Delaware River Basin. We have experienced the evolution of the gas industry first hand within our own County and have seen the many benefits it has brought.

The positive impacts of the gas industry have been widespread and the financial benefits to our County have allowed us to accomplish many positive things for our citizens. The gas industry has boosted economic development and has had a positive impact on many local industries including agriculture. As Governor Wolfe has stated, this truly is a "once in a lifetime opportunity". Please let us know if we can be of further assistance in this initiative.

Alan M. Hall

Elizabeth M. Arnold

MaryAnn Warren