Write DRBC NOW on the proposed frack ban and draft natural gas regulations! Comment period open to March 30, 5pm.

You can submit directly to DRBC here: http://dockets.drbc.commentinput.com/?id=PGChb
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Statement for DRBC Hearing - 2/22/18

My name is Edie Kantrowitz, from United for Action. I am urging the Commission to permanently ban from the Delaware River basin watershed not only gas drilling, but all activities related to natural gas fracking. This includes water withdrawals, and wastewater processing, storage and discharges.

This watershed supplies drinking water for 15-17 million people in four states, including New York City and Philadelphia, as well as providing many other economic and recreational benefits for the area. It is an irreplaceable resource that must be protected for the public, and for future generations. It cannot be allowed to suffer the impacts that will inevitably result from activities related to fracking operations. In recognition of this sacred trust, the DRBC's "Special Protection Waters" regulations do not allow the Delaware River basin's water quality to be diminished in any way. The DRBC Water Code's "Policy of Protection and Preservation" further states that it shall be the Commission's policy to discourage exportation of water from the basin; and that it shall also be policy to discourage importation of wastewater that would significantly reduce the assimilative capacity of a receiving stream. By allowing water withdrawals and wastewater importation related to fracking, the DRBC would therefore be in direct contradiction of its own stated goals and policies.

Water used for fracking, unlike with other uses, is completely lost to the system, either by contamination, or by its removal from the natural evaporation cycle. The Pennsylvania DEP reports that at least 90% of Marcellus Shale frack water injected into wells remains underground. Regardless of use, water withdrawals also have the potential to disrupt or diminish the flow of water to hydrologically connected wetlands and other water bodies such as open ponds and springs. Pumping aquifers can disrupt or diminish available groundwater supporting forests and other vegetation, including agriculture. Water removals also reduce the amount of fresh water available to dilute pollutants.

It has repeatedly been demonstrated that gas fracking in itself contaminates groundwater as fracking fluids migrate from the well site, as well as producing many other adverse effects. For example, of 685 peer-reviewed studies, the overwhelming majority showed evidence of, or potential adverse impacts on, water, air, and human health. And as we know, NY State has banned fracking because the weight of the evidence demonstrated the likelihood that adverse health outcomes and environmental impacts from fracking could not be prevented.

Toxic wastewater resulting from fracking also contaminates streams with dangerous pollutants, benzene, bromide, barium, strontium, toluene, xylene and a host of others, including radioactive materials. While drilling companies in the Marcellus Shale are looking for where to dump increasing amounts of their contaminated water, there is no reason why the Delaware River basin should be the recipient of this toxicity. The currently proposed standards for Total Dissolved Solids do not go far enough to protect our waters from serious degradation.

Beyond all this, it is important to remember that we are in a time of extreme climate crisis, and so the DRBC should not at all be condoning and encouraging the use of natural gas methane, which is 86 times more effective than carbon at warming the atmosphere over a 20 year time period. Current technology has not controlled the leaks and venting losses associated with methane operations, and so emissions from gas development in the Marcellus shale are currently expected to prevent the achievement of Pennsylvania's climate goals. As intelligent and moral people, I ask you, how can we allow this to happen?

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