

Robert Krause  
84 Homestead Trail  
White Lake, NY 12786

18 February 2018

DRBC

To whom it may concern:

**Issue:**

The whole “Proposed Draft Regulations Addressing Hydraulic Fracturing and Additional Clarifying Amendments” appears to be based on the principle of mitigation — how to mitigate spills; how to mitigate health effects; how to mitigate infrastructure degradation; how to mitigate leaks; how to mitigate accidents.

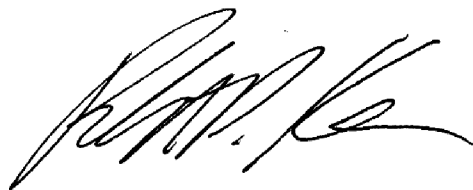
**Details:**

For example, suppose that the industry were successful at “mitigating” toxins in our environment that cause health problems. What, ultimately, does that mean? Suppose that they reduced the potential cases of cancer from 10,000 to 1,000? If this were indeed the case, and judging by the numbers, one may conclude that the industry were successful in its mission of “mitigation.” However, this then implies that while saving 9,000 people, they sacrificed 1,000 people doing so. Mitigation means that SOME people will still get poisoned and die. How is that acceptable?

**Recommendation:**

Until this process can be proven safe, it cannot be allowed to proceed.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Krause', written in a cursive style.

Robert Krause  
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White Lake, NY 12786

18 February 2018

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To whom it may concern:

**Issue:**

One of the chemicals that appears to be in use in the process of fracking is benzene.

**Details:**

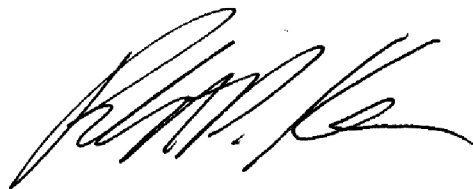
Benzene is one of the most toxic chemicals we know of. It ranks very high in toxicity, along with Plutonium and Mercury. According to the EPA, <https://safewater.zendesk.com/hc/en-us/articles/211403568-4-What-are-EPA-s-drinking-water-regulations-for-benzene-> the maximum allowable level for benzene in drinking water is 5 parts per billion (5 ppb). To put that in perspective 1 drop of benzene in a gallon of water would make that gallon 22,500 times more toxic than the EPA allows. Ten drops of benzene in the town pool would make it a toxic waste site. As you can imagine, dumping fracking waste, high in benzene, would not take much to turn the Delaware River into a toxic waste site.

The industry claims that chemicals make up only about 1% of the fracking fluid (let's assume that to be true). This equates to 1 part per hundred (1/100) of the volume used in the fracking process. However, benzene is toxic at the rate of 1 part per 200 million (1/200,000,000). In other words, if the 1% were benzene, it would be TWENTY MILLION TIMES MORE TOXIC THAN THE EPA ALLOWS.

**Recommendation:**

Until the gas companies refrain from using toxic substances, the DRBC must prevent the discharge of toxic chemicals into the Delaware River.

Sincerely,



Robert Krause  
84 Homestead Trail  
White Lake, NY 12786

18 February 2018

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To whom it may concern:

**Issue:**

Full disclosure to investors.

**Details:**

[http://www.secinfo.com/dsvrp.vazp.htm#\\_105](http://www.secinfo.com/dsvrp.vazp.htm#_105)

In May 2006, Range Resources Corporation, at the time, the biggest hydro-fracturing company in Pennsylvania, provided the SEC with a prospectus. In a surprisingly forthright moment, Range Resources explained to potential investors the risks of hydro-fracturing: "Our business is subject to operating hazards and environmental regulations that could result in substantial losses or liabilities. Oil and natural gas operations are subject to many risks, including well blowouts, craterings, explosions, uncontrollable flows of oil, natural gas or well fluids, fires, formations with abnormal pressures, pipeline ruptures or spills, pollution, releases of toxic natural gas and other environmental hazards and risks. If any of these hazards occur, we could sustain substantial losses as a result of:

- Injury or loss of life;
- Severe damage to our destruction of property, natural resources and equipment;
- Pollution or other environmental damage;
- Clean-up responsibilities;
- Regulatory investigations and penalties; or
- Suspension of operations.

As we begin drilling to deeper horizons and in more geologically complex areas, we could experience a greater increase in operating and financial risks due to inherent higher reservoir pressures and unknown downhole risk exposures" (Range Resources "Prospectus" p. S-13 [5/18/06]).

Therefore, Range Resources tells federal and state environmental regulators and the general public that drilling and the environmental effects are safe, and then tell their investors that there are tremendous economic, health, and environmental risks to this endeavor.

Which is it? Is it safe or are there “severe damage to our [sic] destruction of property,” and “loss of life”?

**Recommendation:**

Until we get consistent truth about the process and its risks, we cannot rely on any statements by industry sources and fracking (and the disposal of fracking fluid) should not proceed — especially in the pristine Delaware River Watershed.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. M. K.', written in a cursive style.

Robert Krause  
84 Homestead Trail  
White Lake, NY 12786

18 February 2018

DRBC

To whom it may concern:

### **Issue:**

In the previously proposed regulations for NY State, the dSGEIS, it states that significant risks to drinking water supplies are possible and that the risks are unacceptable. However, the dSGEIS singles out the NYC and Syracuse watersheds. How is it possible that the DEC believes that there is significant risk to NYC and Syracuse watersheds from hydraulic fracturing yet the DRBC believes that the risks are acceptable for The Delaware River Watershed?

### **Details:**

#### 6.1.5.4 Conclusion

“The Department finds that high-volume hydraulic fracturing activity is not consistent with the preservation of the NYC and Syracuse watersheds as unfiltered drinking water supplies. Even with all of the criteria and conditions identified in the revised draft SGEIS, a risk remains that significant high-volume hydraulic fracturing activities in these areas could result in a **degradation of drinking water supplies from accidents, surface spills, etc. Moreover, such large scale industrial activity in these areas, even without spills, could imperil EPA’s FADs and result in the affected municipalities incurring substantial costs to filter their drinking water supply.** Accordingly, and for all of the aforementioned reasons, the Department concludes that high volume hydraulic fracturing operations within the NYC and Syracuse watersheds pose the risk of causing significant adverse impacts to water resources. As discussed in Chapter 7, standard mitigation measures such as storm water controls would only partially mitigate such impacts. Such partial mitigation is unacceptable due to the potential consequences – adverse impacts to human health and loss of filtration avoidance – posed by such impacts.”

The process is either safe or it is not. If it is banned in NY, in several other states, and in several other countries, it cannot be good for the Delaware River Watershed.

### **Recommendation:**

Because NY state has agreed that this activity can pose significant risks to water supplies and consequently the health of its citizens, we cannot allow the citizens of NY, NJ, PA, DE, MD, and ultimately the Atlantic Ocean to be guinea pigs for an out-of-control industrial process.

Sincerely,

*Handwritten signature*

Robert Krause  
84 Homestead Trail  
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To whom it may concern:

**Issue:**

Trading the health of our citizens for money.

**Details:**

The late, great, Steve Jobs died of cancer. He left an estate of approximately \$7-\$8 billion. He spent millions of dollars on experimental cancer treatments in order to prolong his life. I venture to say that he would have spent billions more if it would have helped him stay alive.

If you were God and offered Jobs the chance to live for another 50 years, but in return he would have to give away all of his money, do you think he would take the trade?

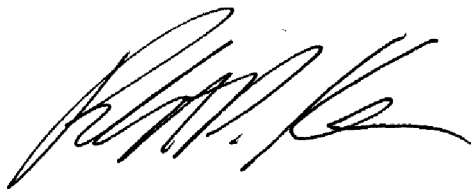
The DRBC is contemplating taking the other side of that trade. In effect, by allowing fracking activity to poison the drinking water supply for 17 million people, you are saying that the health of those citizens is not as important as the money. In other words, if you give us enough money, you can poison our citizens.

**Recommendation:**

Protect the environment and health of the citizens in the Delaware River Watershed regardless of potential profits.

**“It is health that is real wealth and not pieces of gold and silver.” – Mahatma Gandhi**

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Krause', written in a cursive style.