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I support the proposed regulations. If that's all you need to know, read no further.

At one of the two public hearings I attended, the hearing officer noted, in defense of a two-minute time limit on additional public comments, that it has been clear within the first few seconds where a commenter stands. Which got me thinking about the purpose of public comments. If 15 million people currently depend on the water resources of the Delaware basin and millions more in future generations will also, why would the opinion of a few individuals even matter? The specific issues for comment outlined in the notice of proposed rulemaking beg for facts, not opinions.

It may be a fact that the SRBC has found "no discernible impact" of fracking on its water resources, but if 50 commenters state this, it's still only one fact. The summary report of the oft-quoted SRBC study states that, "Potential impacts commonly associated with unconventional natural gas development are related to spills and leaks of hydraulically fractured fluids which can typically be detected as a function of elevated conductance values." Forty five percent of the 53 test sites with a minimum of three years of data exhibited a statistically significant increasing water quality trend for conductance. But you already know this, and the very competent scientists in your employ no doubt reviewed all of the available literature before the commission proposed this draft rulemaking.

What's right for the Susquehanna River basin is not necessarily right for the Delaware for many reasons such as differences in underlying geology. So please, until there are relevant studies that prove the safety of HVHF throughout the Delaware River basin, do not allow it. And please, until the science of treating the specific waste streams of HVHF has been proven, do not allow that either. Please also consider that the haphazard placement of gas wells in the absence of planning has caused additional water quality impacts associated with excessive infrastructure construction.

I have been a resident of the Delaware River watershed for over 50 years. I was exposed to HVHF through my work as an environmental scientist and as a Marcellus-area landowner. At the first "informational meeting" at my township building around 2007, property owners were seduced by potential income and encouraged to organize with information about the need to hire attorneys to get favorable conditions added to standard leases. That leases would be signed was assumed. This subtle form of bullying was most offensive.

The industry took advantage of a regulatory program that did not even address the techniques that they were employing, then claimed to voluntarily reduce the quantity of water used to frack a well or to not send flowback water to sewage treatment plants or to provide potable water to residents whose wells were tainted. Voluntarily, because they were not required by law or regulation to do so, even though the water quality impacts related to HVHF were startling.

It came as no surprise that the industry would shift its focus from northeast PA to western PA and eastern Ohio to extract rich gas and maximize profits. It is disappointing, but also not a surprise, that DRBC is being blamed for this by the individuals and their local governments who would gain the most financially. The industry has drafted unsuspecting surrogates to do their bidding in the Delaware basin while they are busy elsewhere. They'll be back.

I trust that the commission will continue to explore the development of the Marcellus shale resources within the Delaware River basin and its impacts on water resources. Whether these regulations are fine-tuned or rewritten over time, the commission will continue to have regulations

that reflect watershed-specific science while fulfilling its obligation to provide high quality and quantity water resources to current and future generations. Thank you.