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Dear Commissioners,

The risks that fracking poses on public health, safety and overall well being have been well documented and continue to be as additional issues surface. From public health, to plummeting property values, to water and air contamination, to insurance issues, to first responder risks, to local municipality liabilities, to abandoned wells, to lack of government oversight of the fracking industry as a whole, the list goes on and on.

A 2017 study by researchers at the Northeast Climate Science Center and Climate System Research Center at U. Mass Amherst found that the Northeastern U.S. is the fastest-warming region in the lower 48 states, heating at a rate 50 percent faster than the global average. According to the Union of Concerned Scientists, "Records from the mid-twentieth century through 2000 show that the number of snow-covered days across the Northeast has decreased significantly." The shrinking snowpack and increased runoff will worsen as temperatures continue to rise. Further reducing our water supply by moving water out of the basin and exposing our remaining water to fracking waste contamination should not be permitted, especially when those practices support the fossil fuel production that is exacerbating warming in the first place., In fact, at the very same time that warming is posing risks to our water supply, the amount of water required for fracking is increasing. "Oil and natural gas fracking, on average, uses more than 28 times the water it did 15 years ago, gulping up to 9.6 million gallons of water per well." More clean water contaminated means more waste. Fracking was never a good idea, but, as the problems it helped create intensify, it has become such a bad idea that it must be stopped. The Delaware River Basin Commission must provide the protections the Basin deserves and vote in favor of a full ban on fracking, water extraction, and fracking waste processing., Duke University researchers announced in January that they are finding radioactivity in Pennsylvania sediment from a Pennsylvania stream near a plant where fracking waste is treated. Science is still catching up with the damage fracking has done everywhere it's been done. Meanwhile, the Intergovernmental Panel on Climate Change has said, "Climate change challenges the traditional assumption that past hydrological experience provides a good guide to future conditions." Michael Mann says that it would be a mistake to see extreme weather events as the 'new normal'. What we are dealing with is an "ever-shifting baseline." "So, there isn't a

new normal,” he explains. “Things get continually worse if we go down this highway.” We are dealing with many unknowns and when we do learn something, it’s never good news. There are no bases except political expedience and greed that advocate for doing anything but banning all fracking related activities., Enabling the shale gas industry by allowing it to take our water and dump its waste in the basin means that we can expect more industrialization in the basin. We will see more pipelines, power plants, and processing facilities. All of that shale gas infrastructure is designed to be around longer than we can afford to be using fossil fuels. If the Commissioners take into account the cumulative climate impacts of the regulations they are considering, they will see they have no choice but to ban all fracking-related activities in the basin.

Transmission lines have served as the conduit that connects fracking in Pennsylvania to power plants, processing facilities, export facilities, and other infrastructure projects that have spread through the state and across its borders into neighboring states. In the final report of the Pipeline Infrastructure Task Force, PA DEP chief John Quigley said that within a few years, “In the next decade, Pennsylvania will undergo a substantial pipeline infrastructure build-out to transport gas and related byproducts from thousands of wells throughout the state.... The result will impact communities and the environment in every PA County.” The DRBC’s draft regulations do not address pipelines or any of the other infrastructure build-out occurring in the basin. Nevertheless, the regulations that would allow fracking waste to be brought into the basin and clean water to be taken out enable more fracking. And more fracking means more pipelines, more infrastructure., The DRBC is considering fracking regulations it is not capable of enforcing. The Commission relies on the watershed states’ environmental regulators to carry out enforcement of the rules it sets. State regulatory agencies are chronically understaffed and underfunded. It is unreasonable for the DRBC to place on state regulators the burden of enforcement of dangerous practices like fracking waste processing and extraction of water for fracking operations outside of the basin., DRBC’s draft regulations do not specifically propose that injection wells that would hold frack wastewater be allowed in the Delaware River Watershed. However, they do propose to allow wastewater from fracking to be brought into the Watershed for storage, treatment and discharge so “storage” could mean long-term storage of wastewater in underground wells within the Basin. This is a practice that threatens public health and the environment. Injection of wastewater does not “treat” waste or remove contaminants, it simply moves the toxic wastewater produced by fracking from one place and time to another. It risks the migration of untreated toxic and radioactive frack wastewater to aquifers and surface water through leaks from the injection well and spills and accidental releases while being handled. Injection wells are causing earthquakes in Ohio and Oklahoma as well as other locations, as documented by USGS and other scientific institutions. Injection wells are not leak-proof and can exposing groundwater and aquifers to contamination from the toxic mix that constitutes untreated frack wastewater when seals are broken and fractures occur as a result of seismic activity., When a site is developed for gas well development, the change is dramatic, essentially transforming the land to an industrial landscape. The result is destruction of acres of vegetation (8.8 acres per well pad in 2011 with 30 acres of forest impacts due to edge effects, more than double that is the trend today), soil compaction and destruction of the natural land contours, alterations to watershed drainage patterns, and hydrologically connected systems such as wetlands and vernal pools. Habitats and complex ecosystems are disrupted or lost. 85% of the Upper Delaware where the Marcellus Shale is located is

forested. Forest destruction and fragmentation in turn destroys the ability of the forest ecosystem to capture, clean, and infiltrate precipitation, removes the trees that sequester carbon, reduces biodiversity, encourages invasive species, and destroys vital habitat., Changes to stream water quality occur where gas drilling and related activities are located. For instance, a publication of the Proceedings of the National Academy of Sciences found streams adjacent to gas wells are negatively impacted by runoff and sedimentation (Total Suspended Solids), harming benthic life, fish and wildlife and causing streams to be eroded and destabilized. DRBC follows the state's stormwater rules where a project is located, leaving loopholes in current nonpoint source laws that allow fracking activities to escape strict oversight. This would be a recipe for disaster if fracking were to occur, which is why it must be banned in the Delaware River Watershed., DRBC regulates withdrawals from streams with the use of a "pass-by flow" or "minimum flow limit" that limits the amount of water that can be withdrawn to protect streams from being overdrawn. However, a pass-by flow that is based on using the Q7-10 (the flow which occurs for a period of seven consecutive days one time in 10 years – considered "drought flow") is not adequate to protect waterways and the life that depends on them and can be expected to cause direct harm to the habitats and water quality of the stream. Using the Q7-10 allows the stream's flow to be artificially "flattened" because the natural flow regime and seasonality will be disrupted and potentially eliminated. An ecological flow analysis of the waterway and an inventory of the species and habitats that live there is an essential protection. To set an ecological flow to govern withdrawals regulators must measure the natural variation of the waterway's flows in terms of volume, rate, temperature, stream structure, and quality to understand the needs of species and the effects of flow on habitat and water quality. Setting protections based on a waterway's ecological flow regime is necessary to give needed protection but that is not what DRBC does or is proposing to do. The withdrawal of water under the draft and current regulations will significantly damage the ecosystems and species of the streams and rivers that would be tapped., Pennsylvania's Wolf administration talks about a 100-year cycle of shale gas development. At present, there are about 10,000 wells in the ground. The industry's goal is 100,000 wells. In the past ten years, more than 300 confirmed cases of water contamination have occurred. Some of those cases involve several families. More than 9,400 complaints have been filed with the DEP. More than 4,400 of those are water-related. Most have gone unaddressed. More than 1200 peer-reviewed studies have identified wide-ranging health effects already impacting Pennsylvanians. Dead cattle and fish kills are just some of the indications that shale gas development is affecting our farm animals and wildlife. Quality of life is all but gone for many in the shale fields and the many more who now spend every available minute fighting pipeline and infrastructure projects. And all of that and much, much more is what has happened just ten years in. Any action by the DRBC that enables an industry that has done so much to harm Pennsylvanians in just ten years and exposes the basin to the particular threats fracking waste and water extraction pose is unacceptable. The DRBC must impose a full fracking ban.

The newly released Compendium of Scientific, Medical, and Media Findings Demonstrating Risks and Harms of Fracking, 5th Edition speaks to the simple fact that you cannot completely protect people from fracking operations. We cannot prevent accidents from happening. As documented many times handling wastewater in the Delaware basin will cause impacts and contamination. It is not a question of if but when and where.

Sincerely,

Georgina Hricak