

## Todd Waldron

I am writing regarding the Delaware River Basin Commission's ("DRBC" or "Commission") proposed regulations concerning natural gas development and hydraulic fracturing in the Delaware River Basin watershed (the "Basin"). I support the Commission's proposal to exclude hydraulic fracturing ("fracking") from the Basin, however, I also express my concern for certain aspects of the DRBC's proposed regulations. Therefore, I request that the DRBC enact a complete and permanent prohibition on natural gas development and hydraulic fracturing and all related activities; including without limitation, drilling, fracking, wastewater processing and discharges from and water withdrawals for drilling and fracking operations) throughout the Basin.

The DRBC's proposed policy to "discourage the importation of wastewater into the Basin" and the proposed regulations of section 440.5 will not provide effective protection for the Basin from the impacts of wastewater. In protecting a waterway that is of the high environmental quality of the Delaware River Basin, fracking wastewater presents a looming disaster.

The numerous potential negative impacts from hydraulic fracturing wastewater outweigh the effort to regulate same. Among the various issues, I note that the categories of chemicals, and the type of facility (and permitting) required for effective treatment, present enormous hurdles for high quality cold water fisheries. Simply stated, treated wastewater poses a significant threat to the fishery. Whether treated inside the Basin watershed, or already treated and imported by private companies (which, could be just as, if not more dangerous due to potential poor quality control practices), wastewater treatment is an imperfect science and the degradation of watersheds due to allowance of wastewater management is not uncommon.

It is clear that the proposed regulations in the current form do not fully protect the Delaware River Basin's watershed. The comments submitted by this letter identify substantive and significant issues relating to Sections 440.4 and 440.5 of the proposed regulations and generally, regarding any fracking related activities in the Basin. After exhaustive study, the State of New York prohibited fracking based on environmental and public health analysis. The NY Department of Health concluded that the overall weight of the evidence demonstrated the likelihood of the occurrence of adverse health outcomes and environmental impacts from fracking could not be prevented, leading to the Governor's decision to ban high volume hydraulic fracturing in the state. The potential negative impacts stemming from these activities would have long-term consequences for the Delaware River Basin.

Therefore, I respectfully request that the DRBC strike Sections 440.4 and 440.5 from the proposed regulations and revise the proposed regulations to prohibit any activities related to natural gas development and hydraulic fracturing; including without limitation, the storage, treatment, disposal and/or discharge of fracking wastewater within the Basin and the withdrawal of water from the Basin for fracking. Additionally, I fully support the DRBC in upholding the proposed prohibition to hydraulic fracturing in the Basin.

Thank you,

Todd Waldron  
Chestertown NY