

## Ian Kinniburgh

I am writing to express my strong support for the proposal that DRBC impose a complete and permanent ban on fracking within its geographical area, but also to argue that the proposed action by DRBC is incomplete and totally inadequate.

In addition to its numerous direct and indirect adverse effects and risks for the immediate environment, including air and water quality, the use of fracked oil and gas to produce energy contributes to climate change. A ban on fracking serves to reduce both these two negative effects and is indispensable.

The DRBC's proposed ban is therefore a praiseworthy move in the right direction but the overall proposal is insufficient because it will also allow water from the Delaware River Watershed to be used for fracking elsewhere and will allow fracking wastewater from outside the DRBC area to be stored and processed within the area and discharged into the Delaware River.

My understanding is that, quite apart from the subterranean movement of oil and gas, fracking allows for horizontal drilling, meaning that fracking operations in neighboring territory will be able to access underground resources within the DRBC area. The DRBC's two-pronged proposal is therefore a particularly unfortunate form of nimbyism because, by allowing for the possibility of movements of fresh and waste water, it will facilitate, indeed essentially encourage, fracking outside DRBC's boundaries. The ban will therefore not reduce oil and gas production as much as might be anticipated and will have a correspondingly reduced benefit in terms of climate change. Meanwhile the shorter-term local environmental and social costs will simply be shifted from within the DRBC area to outside.

The DRBC is to be commended for proposing a ban on fracking and thereby becoming one of the leaders in opposing this threat to both the local environment and the planet. However, the loopholes allowing for the movement of fresh and wastewater seriously devalue this proposal and turn it into a token gesture. To achieve its supposed objectives and to become an example for others, the DRBC must ban not only fracking but also all fracking-related activities in the Delaware River Watershed.