

Dominic Galante

To Whom It May Concern:

I am writing this letter as a submission to the public comment period ending March 30, 2018, on proposed amendments to the administrative manual and special regulations regarding hydraulic fracturing activities.

First, I applaud the Commission's recommendation to ban high volume hydraulic fracturing in the Delaware River Basin. Thank you for proposing this rule to protect our drinking water from the clear danger that hydraulic fracturing presents. I strongly urge the adoption of this recommendation.

Second, I urge you not to merely require Commission approval for the importation into the Basin, and treatment and discharge within the Basin, of wastewater from hydraulically fractured oil and gas wells. I urge you to ban outright any such importation of wastewater from hydraulic fracturing operations.

The Commission has pointed to the fact that hydraulic fracturing wastewater (also known as produced water) often contains "high concentrations of total dissolved solids ... that may be harmful to human health and the environment." These include salts, metals, and radioactive materials, some of which the Commission admits "that most publicly owned treatment works ... are not designed to remove". We already know of instances where produced water has passed through treatment facilities and still resulted in higher concentrations of chloride and bromide, resulting in cancer causing agents in the water. Produced water will impact the health of humans, livestock, agriculture, and natural environment in the region.

Furthermore, as some chemicals used in the hydraulic fracturing process are considered "Confidential Business Information," the public has no way of knowing what chemicals could end up in the wastewater and, if any wastewater is allowed to pass into the Delaware River Basin, on into our drinking water. It is unconscionable to allow even the remotest possibility of unknown chemicals into our drinking water. Our health and the knowledge of what goes into our bodies is more important than the trade secrets of a private business.

Finally, the Commission has also pointed out that the regulation of produced water largely remains outside current federal regulations. Therefore, the Commission has the responsibility to fill the gap where federal regulation does not exist. And this is a great opportunity to set a strong precedent for the rest of the country and send a message that the health of our citizens is one of the most important priorities of our government. We have seen regulators and regulations fail in this regard, especially in the case of the city of Flint, Michigan, but also in dozens of other areas. The people of the Delaware River Basin do not want to become another case of negligent government oversight and suffer the awful health risks that these chemicals can bring. Please make a blanket ban on importation of hydraulic fracturing wastewater into the Delaware River Basin.

Sincerely,

Dominic Galante