

Nora Nash

Thank you for this opportunity to submit comments.

January 25, 2018

- **Special Regulations Part 440 –Hydraulic Fracturing in Shale and Other Formations.**
- **Revisions to the 4 Commission’s Classifications for project review set forth at 18 CFR 401.35**
- **Guidance for determining Background Concentrations in Surface Waters**

The Delaware River Basin Commission (DRBC)

Hearing #3:

January 25, 2018: 1 p.m. to 4:30 p.m.;
Doubletree by Hilton Hotel Philadelphia Airport,
4509 Island Avenue, Philadelphia, PA 19153;

Sr. Nora M. Nash, OSF

I am Sr. Nora Nash of the Sisters of St. Francis of Philadelphia, a congregation of over four hundred religious women. I thank you for the opportunity to be here today to publicly speak to a revised set of draft regulations, to include: “(a) prohibitions relating to the production of natural gas utilizing horizontal drilling and hydraulic fracturing within the basin; (b) provisions for ensuring the safe and protective storage, treatment, disposal and/or discharge of wastewater within the basin associated with horizontal drilling and hydraulic fracturing for the production of natural gas where permitted; and (c) regulation of the inter-basin transfer of water and wastewater for purposes of natural gas development where permitted.”

Our Franciscan charism calls us to be strong proponents of ecological consciousness, the Sustainable Development Goals, and the Care for Creation. We believe that prohibition of hydraulic fracturing and other shale gas activities within the basin is of utmost importance and a necessity. The Delaware River Basin Commission (DRBC) is correct in seeking public input from individuals and communities within its jurisdiction because of the rights of citizens and the importance of the Delaware River Basin for millions of people who are within its boundaries and beyond. Protecting and conserving the water resources and promoting comprehensive practices for water management is vital in a region that is seeing many negative impacts of shale gas expansion and exploitation in the State of Pennsylvania.

Even though, we're addressing the Delaware River Basin, the **key is in our Pennsylvania Constitution, Article One Section 27.** *The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic, and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all of the people, including generations yet to come.*

The Commission knows that the socio-economic value of The Delaware River Basin is beyond description and the Commission also knows that exposing it to any of the byproducts of natural gas wastes and other GHG emissions would be illogical and detrimental to the life of the River Basin. It is imperative that any regulations would further protect the water and the human right to water for the millions who need access. This River Basin has been an economic engine for over 400 years and continued regulation and monitoring is vitally important for future generations.

I applaud the DRBC for taking extensive steps and time to address regulations at this and other hearings in our region. Most citizens don't want the beauty of the Basin to be exposed to toxicity, as in butane, methane, ethane, and other excessive GHG that are associated with hydraulic fracturing and the extensive infrastructure that this industry requires. We ask the Commission to prevent the oil and gas industry from dictating or determining how the Delaware River Basin will be regulated because we've already seen the problems associated with rubber-stamping and lack of disclosure on the part of the industry. It is also important to remember that the burning of fossil fuels has a negative impact on health and on the environment and is a high contributor to climate change.

The Sisters of St. Francis of Philadelphia have been residents of Delaware County for over 150 years. We support the human right to water for all residents and we trust that the Delaware River Basin Commission will do likewise. We also ask that the Commission continue to ban the use of the River Basin for any and all aspects of fracking and water related use.

Respectfully submitted,



Nora M. Nash, OSF
Director, Corporate Social Responsibility