

Robert H. Yunich

Dear Commissioners:

I am writing to support the commission's proposal to protect our natural resources by prohibiting hydraulic fracturing in the Delaware River Basin, but I urge the commission to strengthen regulations that would let drillers withdraw millions of gallons from these waters and transport fracking wastewater into this area for treatment.

As an angler, I'm concerned about the potential impacts from these activities in a pristine region that has become a mecca for some of the best trout fishing in the Eastern United States.

I am pleased that these measures will protect these streams — both today and for future generations.

But I am concerned about water withdrawals for drilling elsewhere. This could have a major impact on trout habitat and destruction of stream and river banks and beds. The regulations do not spell out how rivers and streams would be protected from low flows and high temperatures that could result if drillers were allowed to withdraw water for hydraulic fracturing. If the final regulations do not prohibit water withdrawal outright, the regulations should specify parameters for withdrawing water. This will be particularly important when releases from the Cannonville and Pepacton Reservoirs into the Delaware River system are curtailed, leading to low water levels and, perhaps, warmer water temperatures. The final regulations also should establish a standard of "due care" to minimize damage to river and stream banks, causing debris from the banks to fall into the water and dislodgement of rocks, etc. in the stream beds.

Likewise, if treatment of fracking wastewater is permitted in this region, the commission should establish water quality standards with regard to tolerable levels for all chemicals that could be present, to ensure wastewater has been properly treated and harmful chemicals have been neutralized.

Finally, I'm very concerned about the commission's ability to enforce these regulations, and urge the commission to establish sound inspection and monitoring protocols and levy fines for non-compliance. In addition to the fines, disregard of the regulations should be punishable by placing an obligation on the perpetrator to rectify damage to streams and rivers and clean up pollution.

I appreciate the commission's thorough study of this issue and thank you for considering my comments. With some tightening, these measures will go a long way toward protecting trout habitat and clean water in the Delaware.

Sincerely,

Robert H. Yunich