

# Chamber of Commerce for Greater Philadelphia

March 29, 2018  
Delaware River Basin Commission  
25 Cosey Road  
P.O. Box 7360  
West Trenton, NJ 08628-0360

Re: Delaware River Basin Commission Administrative Manual and Special Regulations Regarding Natural Gas Development Activities; Additional Clarifying Amendments

Commissioners,

The Chamber of Commerce for Greater Philadelphia brings area businesses and civic leaders together to promote growth and create opportunity in our region. Our members represent eleven counties, three states, and roughly 600,000 employees from thousands of member companies and organizations. We advocate for regional development, business-friendly public policies, and economic prosperity.

Greater Philadelphia is a leading region across energy sectors; we boast strong assets in energy production, resources and innovation. Four years ago, our organization launched the Greater Philadelphia Energy Action Team (GPEAT), a coalition of business, academic and civic leaders focused around the economic opportunity that can be derived from our region's close proximity to Marcellus and Utica Shale, natural gas resources in the Commonwealth of Pennsylvania.

GPEAT has reviewed the proposed rules regarding hydraulic fracturing activities within the Delaware River Basin and oppose any effort to impose an unscientifically supported ban of hydraulic fracturing, which is a highly regulated and environmentally safe technique. GPEAT is also opposed to the other provisions within the proposed regulations that would place unnecessary burdens on the discharge of water from hydraulic fracturing. With that said, the economic and social impacts of the development of natural gas resources in the Delaware River Basin Commission's (DRBC) jurisdiction will be tremendous for the prosperity of the states and communities in and around the Delaware River basin and the economy in this region.

Since 2010, rapid growth in natural gas production has made Pennsylvania the 3rd largest net energy exporter among U.S. states.<sup>1</sup>

The rapid growth of the natural gas industry has been nothing short of remarkable all the while with a 95% compliance record.

The abundance of natural gas has allowed for the soon-to- open Shell Cracker plant in Beaver County, PA. This historic project will provide for a \$6 billion economic infusion in the area, over 6,000 construction jobs and 600 permanent jobs.

Projects like these require stringent resource quality preservation so that our region can continue to thrive, and the entities that propose such projects are vested in the integrity of the natural resources that enable natural gas production and potential downstream activity.

The GPEAT members do not oppose scientifically based and realistic standards, however, the proposed rule to ban hydraulic fracturing and potentially severely limit the disposal of wastewater resulting from hydraulic fracturing are the exact opposite. For evidence, one only need look at the Susquehanna River Basin where this same practice has been successfully employed in over 5,300 active wells. DRBC's sister commission has deployed 50 monitoring stations to gather and scientifically review data from the monitoring stations and issued a report in October of 2017 which concluded that there has been no discernable impact in nearly eight years of monitoring.

As with our industry partners, such as UGI Corp, Marcellus Shale Coalition, Stradley Ronon and other affected parties, we wholly agree with their respective statements regarding the DRBC's proposed rulemaking, citing, amongst other things, the lack of statutory authority, constitutionality, and deliberative procedure regarding public involvement in the final decision making process. GPEAT does not support DRBC's proposed rule to ban all HVHF activities in the basin, as it severely limits the economic and social impact potential in the region surrounding the Delaware River basin. GPEAT appreciates DRBC's efforts to require that high water quality standards are met in approving the importation, exportation, treatment, or discharge of wastewater projects in the Commission's jurisdiction with the consideration that a correlation between natural gas activity and the quality of the water has not been established. Additionally, GPEAT supports DRBC's core mission which includes the integration of environmental and economic needs, and believes that there can be harmony between the preservation of high water quality standards and natural gas activities that provide the economic opportunity in the Delaware River basin region.

Sincerely,

Robert C. Wonderling  
President & CEO

1 U.S. Energy Information Administration, State Energy Data System.



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 **THE CHAMBER** OF COMMERCE FOR GREATER PHILADELPHIA



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Sincerely,

A handwritten signature in black ink, appearing to read "Robert Wondolga". The signature is fluid and cursive, with a long, sweeping underline.



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Robert C. Wonderling  
President & CEO

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<sup>1</sup> U.S. Energy Information Administration, [State Energy Data System](#).