

Chad Eisenman

Comments are in the attached PDF

March 29, 2018

Pamela Bush, Esquire  
Commission Secretary and Assistant General Counsel  
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 [18  
CFR Parts 401 and 440]  
Submitted via: <http://dockets.drbc.commentinput.com/>

Dear Ms. Bush:

On behalf of Chevron Appalachia, LLC, I write to express our support for the comments submitted by the Marcellus Shale Coalition (MSC) regarding the above-referenced rulemaking.

Chevron Appalachia, LLC (“Chevron”), headquartered in Coraopolis, Pennsylvania, manages natural gas assets in the Appalachian region, which, as you may know, is home to some of North America’s largest and richest sources of natural gas from shale. The Marcellus Shale and Utica Shale are primarily located in southwestern Pennsylvania, eastern Ohio and the West Virginia panhandle, where Chevron holds ~400,000 net acres of Marcellus Shale and ~300,000 net acres of Utica Shale.

- Chevron is committed to advancing the industry’s operational performance through technological innovation and the sharing of best practices
- In 2014, Chevron was the first company to be independently certified by the Center for Responsible Shale Development (CRSD) and has maintained that certification through annual audits. The CRSD is an unprecedented collaboration built on constructive engagement among environmental organizations, philanthropic foundations and energy companies from across the Appalachian Basin who share the objective of continuous improvement to ensure safe and environmentally responsible development of our abundant shale resources.
- Chevron wells are designed, drilled, and operated with control systems to protect groundwater throughout the life of the well, we construct and operate our well sites to minimize air emissions, and we monitor all of our well pads to maintain their integrity.

The Delaware River Basin Commission’s (DRBC) intention to prohibit the development of natural gas within the basin has significant and far-reaching implications. First and foremost, property owners within the basin are being denied their right to develop the natural gas resources which they own. This has a significant and detrimental economic

impact on not only the property owners, but also the local communities which are deprived of the jobs, capital investment and economic benefits that flow from development.

Additionally, as outlined in the MSC's comments, we believe the DRBC's proposed action greatly exceeds both its constitutional and statutory authority, while ignoring established science, studies and the history of safe natural gas development that has occurred elsewhere, most especially within the Susquehanna River Basin adjacent to the Delaware River Basin.

We urge the DRBC to withdraw this rulemaking, and instead to work expeditiously to adopt reasonable rules, within the Commission's statutory and constitutional authority, so that natural gas development may proceed in a safe and responsible manner.

Sincerely,

**Chad D. Eisenman**  
Legislative and Regulatory Advisor