

# Lionel Ruberg

It is important to not only support a complete ban on natural gas drilling, but also to oppose proposed regulations 440.5 which would allow the wastewater produced by fracking to be stored, processed, and discharged in the Delaware River Watershed. In addition, we also oppose proposed regulation 440.4 which would allow water to be exported from the Basin for fracking elsewhere.

We need protection from the DRBC, not exemptions. The Federal exemptions reduce control of how hazardous materials from fracking must be disposed of. Rescind the proposed section 440.5 and protect the Delaware River watershed.

The best way to avoid the pollution that results from natural gas operations is to prohibit gas drilling entirely in the river basin. Make the ban total and permanent.

Article I § 27 of our State Constitution guarantees our right to clean air and water. Our water quality must not be degraded. Natural gas activities result in discharges of the myriad of chemicals used in fracking and results in radioactivity downstream.

Proposed Regulation 440.5 must be deleted. No water from outside this watershed should be imported for treatment. Toxic, hazardous and radioactive materials build up over time and are cumulative. Our groundwater and streams would be at risk.

The natural gas drilling industry has already received unprecedented federal exemptions from the Clean Air Act, Clean Water Act and Safe Drinking Water Act. We need more protection from the DRBC, not less.

PA DEP has received over 9,000 public complaints about environmental problems in shale gas drilling areas. We can avoid that grief by banning all gas drilling in the Delaware River basin.

Contaminated fluids from the fracking process has been proven to migrate from the deep shale layers and contaminate our groundwater. Delete proposed regulation 440.5 It makes little sense to allow frackwater fluids to be brought in to our watershed.

Natural gas development has degraded Pennsylvania streams. Spills and deliberate dumping of frackwater flowback have contaminated some of our coldwater fisheries. Keep the complete ban on gas drilling in place. Protect our streams.

Fracking has negative impacts on public health. Air emissions have greater adverse health impacts on those who reside in or frequent areas within two miles of gas operations. Article I § 27 of our State Constitution guarantees our right to clean air. Keep the complete ban on gas drilling in place.

Most of the Delaware River is protected by the Commission's "Special Protection Waters" regulations. Water quality is not allowed to be degraded. Keep the total ban on gas drilling in place.

"Treatment" & discharge of fracking wastewater will degrade the water quality of the river.  
Rescind proposed section 440.5

The Precautionary Principal states that if you cannot predict all the effects of an action, do not do it.  
Do not allow any gas drilling in the Delaware River Basin.

Allowing gas drilling in the Delaware watershed puts the water supply for up to 17 million people at risk. Pennsylvania Department of Environmental Protection (PA DEP) has determined that there are 300 cases of private water well contamination caused by oil and gas operations in the Commonwealth. Keep the ban on natural gas drilling in place.

Between 2004 and 2016, PA DEP handled 9,443 complaints about environmental problems in shale gas drilling areas. We do not need those problems in the Delaware River watershed. Keep the total ban on gas drilling in place.

Peer-reviewed studies in western Pennsylvania show that radioactive materials have accumulated over 600x normal, downstream from "treatment plants". Eliminate Section 440.5 Do not allow frackwater to be imported into the Delaware River watershed for "treatment".

Many of us rely on our water wells for our homes. Water is life. We cannot chance having our wells contaminated by gas drilling activities. Do not allow any gas drilling activities in our watershed.

We have seen only a small fraction of the total build-out of natural gas in Pennsylvania. In the future, the drilled laterals will be longer and the amount of water per well will more than double. That will result in huge volumes of frackwater flowback that must be disposed of properly. With no cradle-to-grave accounting of that flowback, we fear that spills will not be reported and illegal disposal of that flowback will be a huge problem. The only way to protect us is to keep the ban on gas drilling in place.

Thank you for considering my views,

Lione Ruberg