## Henry Alexander

I support a COMPLETE ban on fracking, fracking waste disposal, and use of Delaware River Basin water for fracking use. In my comments, I address two issues in this complex regulation. The first is that we want to ban any transfer into or storage of fracking fluids in the Delaware River basin. The second is that Fracking produces huge amounts of unused methane that is a significant greenhouse gas and which the industry has no intention of controlling.

DRBC's draft regulations do not specifically propose that injection wells that would hold frack wastewater be allowed in the Delaware River Watershed. However, they do propose to allow wastewater from fracking to be brought into the Watershed for storage, treatment and discharge so "storage" could mean long-term storage of wastewater in underground wells within the Basin. This is a practice that threatens public health and the environment. Injection of wastewater does not "treat" waste or remove contaminants, it simply moves the toxic wastewater produced by fracking from one place and time to another. It risks the migration of untreated toxic and radioactive frack wastewater to aquifers and surface water through leaks from the injection well and spills and accidental releases while being handled. Injection wells are causing earthquakes in Ohio and Oklahoma as well as other locations, as documented by USGS and other scientific institutions. Injection wells are not leak-proof and can exposing groundwater and aquifers to contamination from the toxic mix that constitutes untreated frack wastewater when seals are broken and fractures occur as a result of seismic activity.

The fracking boom is increasing the amount of methane being emitted to the atmosphere and the industry steadfastly refuses to control it. In a press event at COP23, Robert Howarth, the David R. Atkinson Professor of Ecology at Cornell University said, "Methane is an important greenhouse gas and is currently responsible for an amount of global warming equal to approximately 60% of that caused by carbon dioxide. Methane reductions offer one of the few available approaches to immediately slow the rate of global warming, since the climate responds more quickly to decreases in methane compared to carbon dioxide." A ban on fracking in the Delaware River Basin is an important step in limiting methane emissions, but allowing water withdrawals and the processing of fracking waste in the Basin will only enable more fracking and, therefore, more methane leaks outside of the basin.