

## Alice Zinnes

Part of the DRBC's proposed draft fracking regulations states the following regarding produced water:

Related Commission Policies.

1. (1) It is the policy of the Commission to discourage the importation of wastewater into the basin (see Section 2.30.2 of the Delaware River Basin Water Code, incorporated by reference at 18 CFR Part 410).
2. (2) It is the policy of the Commission to give no credit toward meeting waste water treatment requirements for wastewater imported into the basin (see Section 2.30.6 of the Delaware River Basin Water Code incorporated by reference at 18 CFR Part 410).

These regulations are vague, and as such create loopholes for poorly regulated toxic water to enter the Basin. The term "discouraged" is not defined and so means absolutely nothing, except that it allows the possibility of produced water to contaminate the DRB. It is quite possible that this loophole was written specifically for re-opening a Dupont waste treatment plant in Southern New Jersey. But Dupont's wishes should not control DRBC's policy. Please see the following article on the Dupont waste plant:

<https://www.northjersey.com/story/news/watchdog/2018/02/27/dupont-spin-off-company-bypass-environmental-review/372586002/>

Also the DRBC will give no credit toward meeting waste water treatment requirements for imported wastewater

Rather than create loopholes that will allow poorly regulated produced water into the Basin, the DRBC must ban all produced water from fracking operations to enter the Basin.