

LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA 226 Forster Street, Harrisburg, PA 17102-3220 717.234.1576

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RECEIVED/DELAWARE RIVER BASIN COMMISSION

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January 11, 2011

Ms. Carol Collier, Executive Director Delaware River Basin Commission 25 State Police Drive Post Office Box 7360 West Trenton, New Jersey 08628-0360

Dear Ms. Collier,

Haste makes waste. What we don't know about the consequences of slick water hydrofracking for natural gas will hurt us.

The League of Women Voters of Pennsylvania believes that the DRBC should extend the review period for the recently released draft regulations. This is in keeping with our position that supports the maximum protection of public health and the environment by requiring the use of best practices and promoting comprehensive regulation, communication, and adequate staffing across government agencies in all aspects of Marcellus Shale natural gas production, site restoration, and delivery to the customer.

Given the importance of the Delaware River Basin to the health and wellbeing of our Commonwealth and neighboring states, the current review period of ninety days for the draft regulations is inadequate. Why?

- Draft regulations are based on incomplete information. Studies are not yet completed. Cumulative impacts as well as long-term implications are yet to be explored. Complex relationships between drilling processes, time, geological features, and environmental factors require extensive analysis.
- Wastewater treatment issues are not resolved. In fact, 1.8 million gallons of partially treated wastewater have already been discharged into Neshaminy Creek. Effective permitting, regulation, monitoring, and enforcement must be in place for the treatment and disposal of wastewater before any drilling regulations are finalized.
- Given the thousands of letters and comments related to drilling issues in the recent past, the current timeline is unrealistic. The public needs time to review the lengthy document and provide significant feedback. The DRBC needs time to hear the voices of the public in a variety of venues across four states.

We encourage you to extend the timelines from 90 to 180 days to expand the scientific knowledge on which such regulations are based; to resolve wastewater treatment issues through establishing proper safeguards, and to facilitate public participation in this critical decision.

Sincerely,

Olivia Thorne,

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President