

March 24, 2011

THE SISTERS OF ST. FRANCIS OF PHILADELPHIA
Commission Secretary, DRBC
25 State Police Drive
P.O. Box 7360
West Trenton, NJ 08628-0360

RECEIVED/DELAWARE RIVER
BASIN COMMISSION

2011 MAR 28 P 12:45

Re: Draft Natural Gas Development Regulations

Dear Carol Collier and DRBC Commissioners:

Thank you for extending the Public Comment period until April 15th, but that is still far too short, because gas development upstream will degrade the entire watershed. Please extend the comment period for two years. We are not protected from high levels of radioactivity in gas drilling waste; this is an outrage! You must hold hearings downriver, including in the State of Delaware.

No gas drilling waste should be created in the Delaware River watershed, because there is no way to dispose of it safely. Toxic radioactive waste has already been dumped into our rivers and streams (1.3 billion gallons of it!) without adequate treatment or testing. With absolutely no study, with health impacts ranging from asthma and headaches to nosebleeds, nausea, lesions, and cancer, it is premature for these regulations to be released, let alone finalized.

Please maintain a complete gas drilling moratorium and withdraw the draft regulations for gas drilling in the Delaware River watershed, which do not address acute or cumulative health risks. Please wait to take into account the EPA study of deep gas drilling's life cycle impacts. Please rewrite the regulations only AFTER a Cumulative Impact Study has been completed for the Delaware River watershed.

The draft regulations fail to take into account the network of pre-existing fractures deep underground which could convey contaminants slowly into groundwater and surface water. Your Compact mandates that you must "prevent future pollution," but these regulations ignore cement casing degradation and hydrogeological evidence that high-volume fracturing could create catastrophic future pollution.

Regarding gas drilling waste in the Delaware River watershed (Section 7.6 of the Draft Regulations). One, there must be NO IMPOUNDMENTS for flowback anywhere in our watershed; these open, plastic-lined pits are each a Superfund site in the making, and must be completely outlawed. Two, wastes must be tested for 4NQO, a potent carcinogen known to show up in flowback as a result of chemical interactions. Three, there must be no discharge of gas drilling waste in the basin. Four, there must be no toxic chemicals injected underground as part of gas drilling unless or until the Halliburton Loophole is completely closed and the process is proven safe for the environment and human health.

Sincerely yours,

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