



LEAGUE OF WOMEN VOTERS®
OF NEW JERSEY

February 24, 2011

Ms. Carol Collier, Executive Director
Commission Members
Delaware River Basin Commission
PO Box 7360
West Trenton, NJ 08628

Re: New Article 7 of Delaware River Basin Commission Water Quality
Regulations (18 CFR PART 410)

Dear Director Collier and Commission Members:

The League of Women Voters of New Jersey (the League) wishes to express its concern about the premature adoption of regulations on natural gas development, including hydraulic fracturing ("fracking"), in the Delaware River Basin (New Article 7). The League is a non-partisan, non-profit organization that has long held positions which support open government and the active and informed participation of citizens on public issues. In addition, the League has a long history in support of protecting our water resources and has been active in the efforts of the DRBC to protect the Delaware River Watershed. The Delaware is the source of drinking water for one-third of the residents of New Jersey. The fallout from any drilling activity within the Watershed will affect millions of residents who draw drinking water and derive recreational benefits from the Delaware.

Our concerns were raised earlier this month when we participated with the Delaware RiverKeeper and several other environmental and community organizations in a letter to the Commission. We feel so strongly about the

inadvisability of promulgating regulations at this time, however, that we are compelled to go on record at this public hearing.

So as not to publish critical regulations which will affect New Jersey residents decades from now without adequate public input, the League requests the comment period on New Article 7 be extended to at least 120, if not 180 days. In addition, public hearings should be held at geographically accessible locations in each Basin state and there should be at least one public hearing in New York City and one in Philadelphia.

The League urgently requests that you delay the promulgation of regulations until the Commission has received and considered the results of an independent cumulative impact analysis on the effect that gas drilling will have on the quantity and quality of the waters in the Delaware River Basin. It should also address the specific characteristic of the shale formation and the potential for seismic activity. In addition, empirical data from wells in other locales illustrates that the drilling process as well as the compressor stations serving it, release air pollution which will affect New Jersey residents and settle out in our surface waters and reservoirs. This, too, needs to be taken into account before regulations are drafted. It is worth noting that initial results from the EPA fracking study are due in 2012.

Hydraulic fracturing technology is still in the experimental stages. Its cumulative long term impacts are not known. Therefore, it is not in the best interest of the citizens of New Jersey, New York, Pennsylvania or Delaware for the Commission to fast track the regulations before all the science is in. We urge you not to rush this process to the prejudice of Basin citizens. Prudence dictates reasoned consideration now rather than rushed action which could have long term catastrophic irreversible effects.