

*"An Injury To One Is An Injury To All"*

## **Pennsylvania Federation**

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Office of the General Chairman  
Jed Dodd

February 22, 2011

Commission Secretary, DRBC  
25 State Police Drive  
P.O. Box 7360  
West Trenton, NJ 08628-0360  
Re: Draft Natural Gas Development Regulations

Dear Carol Collier and DRBC Commissioners:

Our Union represents the men and women who maintain and construct the railroad tracks, building and bridges and overhead catenary systems for Amtrak, Conrail, Norfolk Southern and CSXT. Protecting our water in particular and the environment in general from runaway corporate greed is of critical importance to our members.

We are writing to ask you to withdraw the draft regulations for gas drilling in the Delaware River watershed because they are inadequate to cover the acute and cumulative risks to our waters. The public comment period must be extended and expanded to include public hearings in each state, and three hearings in Pennsylvania. There's no hearing in the state of Delaware! This is unconscionable, as gas development upstream will degrade the entire watershed.

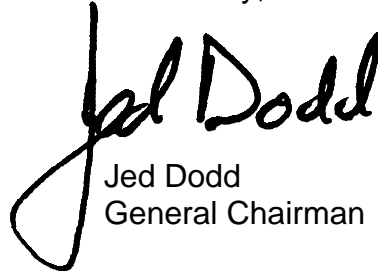
We ask that you push the March 16th Public Comment deadline back by a minimum of six months and not finalize any regulations for at least two years, in order to take into account the EPA study of deep gas drilling's life cycle impacts on water. Please rewrite the regulations after a Cumulative Impact 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 hydrogeological evidence that high-volume fracturing could create catastrophic future pollution. It also fails to plan for the inevitable degradation of cement casings over time.

Clearly toxic spills to surface waters are frequent in all phases of high-volume

hydraulic fracturing with horizontal drilling. Lawsuits about groundwater contamination are sprouting rapidly in many states, including Pennsylvania and New York. With so many risks, with absolutely no study, and with many unresolved complaints including severe health impacts ranging from asthma and headaches to nosebleeds, nausea, and cancer, it is premature for these regulations to be released, let alone finalized.

We would like to add substantive comments regarding gas drilling waste in the Delaware River watershed (Section 7.6 of the Draft Regulations). One, drilling mud and flowback must be classified as "hazardous waste," because it contains contaminants deadly to biological life. Two, 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. Three, wastes must be tested for NCQO, a potent carcinogen known to show up in flowback as a result of chemical interactions. Four, there must be no discharge of gas drilling waste in the basin. Gas drilling waste puts all our health at risk.

Yours truly,

A handwritten signature in black ink that reads "Jed Dodd". The signature is written in a cursive style with a large, looping initial "J".

Jed Dodd  
General Chairman