

DRBC meeting June 10, 2020

COMMENT - from B. Arrindell, Director, Damascus Citizens for Sustainability

First I would like to acknowledge the increased impacts to environmental justice communities, where air and water pollution is so much greater and the magnitude of Covid suffering and deaths are the largest. With US Covid deaths close to 115, 000 - 115 thousand! - environmental in-justice communities will only suffer more unless the DRBC acts.

Waste from oil and gas mining was re-named 'special' by the Bentsen amendment to the federal Resource Conservation and Recovery Act (or RCRA) in 1980 so that these wastes would not be regulated as the toxic materials that they are. RCRA takes a "cradle to grave" approach to ensure wastes are handled properly from the point of creation to final disposal. As 'special' wastes, produced water from drilling is unregulated. Also then the gas and oil companies were isolated from the liability they would have if this waste was regulated as toxic. Because it is labeled 'special' does not mean that it is not toxic - it is toxic and many of the chemicals in it are very harmful even in tiny amounts when they act as hormones. For example, studies of humans and horses show that exposure to this chemical laden waste causes increased birth defects and cancers, among other impacts.

Regulatory constraints are the obligation of government to protect health and safety. It is the DRBC's mandate to protect and preserve the Basin and its resources for current and future residents, human and otherwise - it is our home. That the DRBC would consider allowing these wastes into the Delaware Basin in order to "regulate" them is short-sighted and a false economy of effort. It is always better to prevent pollution rather than attempt to clean up after. Because of the unregulated nature of these materials, how would the DRBC know what and how much wastes are coming into the Basin in order to 'regulate' their transport and disposal. The DRBC is asking for the illegal dumping and trucking accidents that happen regularly in other areas. We depend on the DRBC to keep the Delaware Basin healthy - the wastes should not be allowed into the Basin and should be banned with the high volume fracking already proposed. These pollution risks are too dangerous to allow; DRBC must ban fracking and all its activities. Please call the vote.