

From: noreply@smartcomment.com
Subject: Proposed Draft Regulations Addressing Hydraulic Fracturing and Additional Clarifying Amendments comment
Date: March 29, 2018 at 10:33:49 PM EDT
To: dcs@DamascusCitizens.org

Thank you for your comments on the Proposed Draft Regulations Addressing Hydraulic Fracturing and Additional Clarifying Amendments. Your comments have been received.

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Submitted By: Damascus Citizens for Sustainability
Proposed Draft Regulations Addressing Hydraulic Fracturing and Additional Clarifying Amendments

Dangers of Vertical oil gas Wells - the 2010 Reports - part 1 of 3

These expert reports were commissioned by Damascus Citizens for Sustainability and Delaware Riverkeeper Network. These reports were submitted as direct testimony in a consolidated administrative hearing before a hearing officer appointed by the Delaware River Basin Commission.

DCS' attorney, Jeff Zimmerman's explanation of the hearing: At issue in this hearing were two determinations regarding so-called exploratory or test wells by the executive director of DRBC, one known as the SEDD and the other as the ASEDD. SEDD stands for "Supplemental Executive Director Determination" and ASEDD for "Amended Supplemental Executive Director Determination. The SEDD subjects almost all exploratory wells in the Basin to full Commission review thus reversing an exception for exploratory wells in a prior executive director determination that made all shale gas production wells subject to full Commission review. The application of the SEDD to exploratory wells was challenged by an alliance of property owners who have all leased land to the gas companies. Another part of the SEDD gave an exception to allow approximately 15 wells permitted by

Pennsylvania over the period from the production well determination to the SEDD to proceed without any review by the Commission. ♦ The ASEDD allowed 2 additional exploratory wells that had not obtained final permits from Pennsylvania to also proceed without any Commission review. This Reservation Provision (aka Grandfathered Wells) of the SEDD and the ASEDD was challenged by DCS and DRN. ♦ [L][SEP] The hearing was aborted by the industry wanting to trade cancelling the hearing in exchange for them agreeing to no additional 'exploratory' wells to be permitted and those permitted but not started would not be developed in the DRB. I and others feel strongly that they were very impressed by the information in the reports on what damage has been caused or could be caused by the vertical and not hydraulically fractured wells they were labelling 'test' wells and did not want that information to be publicized. It is on the strength of that recommendation that I offer them in this comment and the following comments to stress that NO gas or oil drilling should be allowed in the Delaware Basin. The proposed prohibition of high volume hydraulic fracturing is good and should be adopted, but additionally all - even low volume, vertical wells should also be prohibited.

These reports were submitted in December of 2010 and a lot of additional research and exploration has been done of the damages caused by oil and gas drilling and all the processes involved in fracking the information in these reports is still viable and must be paid attention to. For newer material see, e.g., the fifth edition of the Compendium, <http://concernedhealthny.org> Additionally according to the federal EIA "up to 95% of all new wells" since 2013 are fracked - US Dept. of Energy, How is shale gas produced?, Apr. 2013 ♦ https://energy.gov/sites/prod/files/2013/04/f0/how_is_shale_gas_produced.pdf [L][SEP] This means that by only prohibiting the high volume process the Commission is leaving the DRB open to damage by these other activities.

As a result of the number of and size of some of the reports this is PART 1 of 3 [L][SEP] This comment has the 5 reports commissioned by the DRBC [L][SEP] Anderson-Kreeger [L][SEP] O'Dell [L][SEP] Silldorff [L][SEP] Sweeney-Jackson [L][SEP] Volz

Attachment(s):

Volz Report - DRBC 112310.pdf

O'Dell Report - DRBC 112310.pdf

Anderson-Kreeger DRBC Report 112310.pdf
Silldorff Report - DRBC 112310.pdf
Sweeney-Jackson Report - DRBC 112310.pdf