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INDEPENDENT REGULATORY
NEW COMMISSION

We need strong standards for treatment and disposal of Marcellus wastewater. I am not against the development of our natural gas resources. I am against jumping into this development without having the most appropriate regulations and standards in place. We are still paying the price for not doing this for the coal industry in Pennsylvania.

Key points I am concerned about in the development of the Marcellus shale:

The frackwater must be monitored via a chain of responsibility of signed paperwork documenting the origin, use, flowback, transportation, treatment and disposal of all frackwater fluids.

Our streams cannot be dumping grounds for frackwater; we must have a standard for Total Dissolved Solids (TDS) allowed in our water.

The standard for TDS should be stated as a daily maximum, not a monthly average and there should be a minimum requirement that all discharges not cause background in-stream concentrations of TDS to rise above 133% of background levels (the Delaware River Basin Commission standard).

The proposed definition of large TDS sources by the PADEP is good. All large TDS sources should be covered by the standard. New sources and new discharges at existing sources should be covered immediately.

Let's do it right this time! We do not have to drill every hole tomorrow, we do have the time.

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