From:

Organizations United for the Environment [oue@ouenews.org]

Sent:

Friday, February 12, 2010 8:01 AM

To:

EP. ReaComments

Subject:

Re: 25 Code, Chapter 95, Wastewater Treatment Requirements

## Organizations United for the Environment PO Box 193 Allenwood PA 17810 www. ouenews.org

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INDEPENDENT REGULATORY REVIEW COMMISSION

This submission may be a duplicate.

February 12, 2010

To: Members of the Environmental Quality Board:

From:

Linda S. Godfrey 164 State Route 304 Apt. 1 Winfield, PA 17889

Re: 25 Code, Chapter 95, Wastewater Treatment Requirements

I am writing on behalf of Organizations United for the Environment, a citizens' action group with over 1400 supporters, based in Allenwood, Pennsylvania.

The mission of our organization is to help preserve and protect the environment of the Central Susquehanna Valley now and for future generations. We appreciate the opportunity to comment on proposed new regulations to Pennsylvania Code 25 Chapters 93 and 95 concerning TDS discharges to Pennsylvania's rivers.

We strongly favor and urge adoption of the proposed regulations as a much-needed first step toward protection of Pennsylvania rivers and water supplies from mining and rapidly expanding Marcellus shale drilling operations across the Commonwealth. High TDS levels have already raised concerns in parts of the Commonwealth and are an ongoing burden our rivers carry. Gas-drilling activities soon will generate millions of gallons of wastewater on a daily basis. Plans for wastewater disposal in Pennsylvania rivers and streams are currently under consideration, yet technologies to remove or dilute the enormous amounts of TDS contained in wastewater are still in development. Clearly, unless limits of TDS are set, respected by industries, and strongly enforced, we will have long-term problems from damaging pollution of our water supplies that may be

irreparable. Please act now and in future deliberations to avoid consequences that are certain to cause further harm to our groundwater, streams and rivers.

Not only are our waterways and the aquatic life in them at risk, but increased levels of TDS and other contaminants may severely impact drinking water supplies in many areas and threaten Pennsylvania's tourism and sporting economies. Harm to Pennsylvania's agricultural industries might be incalculable. We hope you agree that these risks are not worth taking. While some stand to reap fortunes---particularly the oil and gas and supporting industries and landowners who agree to allow drilling on their private lands—all of us, but particularly Commonwealth regulators and legislators, must be vigilant in tackling problems that are known and anticipated before they occur. While vigilance is required of everyone involved, industries alone must bear not only the development costs, but also the environmental costs of oil and gas exploration and production, a highly transformative business. I have visited a Marcellus drilling site in Pennsylvania, and I was appalled to see a lovely green hillside turned into a dirty, noisy, industrial zone. Pennsylvania has a long history of degradation caused by extractive industries. Evidence of the true costs of such reckless plundering of the environment is still being borne in some areas where Marcellus shale exploration is occurring today. Without stringent regulations in place, we cannot imagine how one can enter into agreements that jeopardize the health of our communities and our pristine wild lands, and that may potentially contaminate the very substance that keeps us alive.

No one will argue that the natural gas boom in Pennsylvania has emerged very rapidly. Despite this sudden onslaught, and the expediency desired by the industry, all aspects of the rush to drill in Pennsylvania deserve time and careful consideration. The oil and gas industry is a well-funded machine that will not be deterred. This industry *must* be required to meet *our* standards, not set their own. It is the only way Pennsylvanians can derive a true benefit from the development of this and the other resources on extended loan to us. Not only do we want to live healthy lives in a clean and unspoiled environment, we want to leave something of worth for the generations to come.

Linda S. Godfrey Board member, Organizations United for the Environment 164 State Route 304 Apt. 1 Winfield, PA 17889