



DELAWARE-OTSEGO AUDUBON SOCIETY, INC.

P.O. Box 544, ONEONTA, NY 13820

Commission Secretary
Delaware River Basin Commission
P.O. Box 7360
25 State Police Drive
West Trenton, NJ 08628

February 22, 2011

The following are formal comments by our organization on the pending Draft Natural Gas Development Regulations.

The Delaware-Otsego Audubon Soc. is the Chapter of the National Audubon Soc. covering Delaware and Otsego and portions of Schoharie and Chenango Counties in New York. A large part of our Chapter area is within the Delaware River watershed, and the environmental quality of the river, its tributaries, and the lands making up the watershed are of great importance to our organization and members.

We have adopted a formal position statement detailing our position on gas drilling and hydrofracking wells (attached). Our first concern in that statement is *“potential ground and surface water contamination from the many toxic chemicals used in hydrofracking the shale”*.

We further state that *“The practice of injecting large quantities of toxic substances into the earth to physically fracture it and permanently leave behind damaged geology and foreign substances is an assault on the very resources that sustain life. This damage will remain for millennia, and will threaten unseen future generations, as well as present-day humans and wildlife. Even with the most stringent controls and oversight, this activity is an unacceptable danger to our planet, with no environmental benefits. As such, we oppose hydrofracturing gas exploration and production in our region and elsewhere.”*

The draft regulations put forth by the Commission attempt to put in place such stringent controls and oversight. However, it is clearly impossible for the Commission or any other agency to administratively control, regulate or otherwise assure the safety of an activity that largely takes place thousands of

feet below the surface of the earth, and the ramifications of which may not be apparent or experienced for hundreds or thousands of years.

If this body is to responsibly “. . . *protect the water resources of the Delaware River Basin . . .* “ and “. . . *avoid pollution of or injury to the water resources of the Basin*” as the draft regulations envision, it should deny any and all uses of Delaware River basin ground or surface waters, or disposal of any wastewaters, or importation of water for the purpose of hydrofracking gas wells or related activities.

We call on the Commission to withdraw the draft regulations and enact a permanent ban on use of basin waters for these purposes. Anything less would be an abrogation of your responsibilities to the waters and the residents of the Delaware watershed.

Sincerely,

A handwritten signature in cursive script that reads "Andrew Mason". The signature is written in black ink and is positioned below the word "Sincerely,".

Andrew Mason, Conservation Chair