



The  
Lackawaxen River  
Conservancy

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Delaware River Basin Commission  
Commission Secretary  
P.O. Box 7360  
West Trenton, NJ 08628-0360

Re: Stone Energy Dockets 2009-13-1 and 2009-18-1

Dear Commissioners,

The Lackawaxen River Conservancy, (TLRC) a grassroots organization located in Rowland PA, would like to submit comments in regard to Stone Energy Dockets 2009-13-1 and 2009-18-1. Stone Energy's plan to drill for natural gas in Wayne and Pike Counties is inconsistent with TLRC's mission to protect and preserve **the Lackawaxen River, its wildlife, watershed and natural beauty**. Approval of these dockets, in the bigger picture, could mark the beginning of irreversible damage to the Lackawaxen River's watershed, its sensitive ecology and the future health of its residents.

Of particular concern is Docket 2009-13-1, which calls for the withdrawal 700,000 gallons/day from the West Branch of the Lackawaxen, a Class A cold water trout stream. This amount of water far exceeds what Stone Energy would require for its proposed drilling operation as described in these dockets. Huge withdrawals of water from this tiny mountain stream would disrupt its natural flow and overheat the water, seriously threatening the aquatic life in the river and the wildlife along its banks. In addition, the location of the withdrawal, in a remote area of Wayne County, is not consistent with best management practices (BPM's) of the water resources. Water for industrial use should not be taken from sensitive head water tributaries with erratic flows.

The West Branch of the Lackawaxen constitutes the river's headwaters. Any disruption of the flow will certainly have negative effects upon the main stem. Since the Lackawaxen is a major tributary of the Delaware River—which is the source of drinking water to more than 15 million people within the Delaware River Basin—the importance of maintaining its high quality water cannot be overstated.

With respect to the application for natural gas exploration and development, Docket D2009-18-1, TLRC is concerned about the chemical content, storage, transport and disposal of the toxic flow back water. The threats that horizontal fracking pose to underground aquifers and private wells are real, as the experiences of residents in Dimock, PA, and elsewhere all too vividly demonstrate. Leakage from holding tanks, spills and accidents are inherent in transporting millions of gallons of toxic fluids along rural roads.. Moreover, existing waste treatment facilities are woefully inadequate to treat fracking's toxic flow back water. Although Stone Energy has indicated it would dispose of the water from the Matoushek well site at a waste treatment facility outside the Delaware River Basin, it has not specified the location of that facility.

With a financial incentive to make money, gas drilling companies may be tempted to cut corners leading to permanently damaged water supplies. The PA DEP, the responsible watchdog agency, does not have the trained resources dedicated to ensuring that companies strictly adhere to regulations. Therefore it is incumbent upon the DRBC to weigh these dangers when considering any application to permit gas drilling not only within the Lackawaxen River watershed, but also, within all areas of its jurisdiction.

TLRC is encouraged by the recent EPA decision to undertake a national study of the dangers posed by fracking. We strongly urge the DRBC to defer approval of any drilling applications until that study is complete. The gas industry is made to comply with Safe Drinking Water Act regulations and be subject to the most stringent protective regulations..

The Department of Conservation and Natural Resources has designated the Lackawaxen River **Pennsylvania's 2010 River of the Year**. Its purpose in doing so is to call attention to the ongoing conservation needs and potential future threats to the river. TLRC is of the view that the greatest threat imaginable, here and in any watershed, is fracking for natural gas. It would be a tragic irony if the DRBC were to allow the Lackawaxen River and its watershed to be contaminated by granting gas drilling permits.

Sincerely yours,

Winifred Olsen  
TLRC President