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NEW JERSEY CHAPTER

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www.SierraClub.org/NJ

April 12, 2010

Paula Schmitt, Commission Secretary
DRBC
25 State Police Drive
P.O. Box 7360
West Trenton, NJ 08628

Re: New Jersey Sierra Club Comments on Stone Energy Dockets (D-2009-13-1 and D-2009-18-1)

Dear Ms. Schmitt:

The New Jersey Sierra Club strongly encourages the Delaware River Basin to deny the application submitted by Stone Energy Corporation for natural gas drilling and surface water withdrawals within the Delaware River Basin. The commission should not approve drilling permits before regulations are in place to protect drinking water. We believe that approval for these projects should be delayed until industry regulations are implemented.

There are currently no regulations for shale gas extractions to protect our drinking water or the environment. This extraction is exempted from provision of the Clean Water Act. The EPA has just convened a group to review the process.

All along the Delaware River leases are being sold for natural gas drilling. Drilling in New York and Pennsylvania will have direct impacts on the Delaware River and New Jersey's drinking water. The Delaware River provides drinking water for 3 million New Jersey residents. New Jersey cities like Trenton, Phillipsburg and many South Jersey towns rely primarily on the river for drinking water.

Drilling for natural gas in the Marcellus Shale, involves horizontal drilling and hydraulic fracturing ("fracking"). The average well uses 2.5 to 4.5 million gallons of water for fracking. Many wells are fracked two to three times. This requires mixing millions of gallons of water with toxic chemicals. The toxics include volatile organic chemicals like benzene, methyl benzene, formaldehyde, and others that are linked to cancer. The process also releases toxic chemicals that are naturally trapped in the shale like arsenic and mercury. Thirty to 70% of this water is left in the wells, and can lead to contamination of drinking water.

All along the Delaware River leases are being sold for natural gas drilling. Drilling in New York and Pennsylvania will have direct impacts on the Delaware River and New Jersey's drinking water. The Delaware River provides drinking water for 15 million people. New Jersey cities like

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Trenton, Phillipsburg and many South Jersey towns rely on the river for drinking water. New Jersey will also be impacted by the proposed natural gas pipelines from the River Basin through the Highlands region of the state.

Municipal sewage plants are not equipped to handle the potential toxins and salts in drilling waste fluids. Properly licensed and operated water treatment facilities do not exist and are not planned in the Delaware River Watershed to manage the waste fluids. Many of these places are in such rural areas that they lack sewage plants altogether. Before approval of any drilling projects, a sufficient waste management plan needs to be enacted.

The significant lowering of water levels as a result of drilling poses severe environmental risks. Withdrawal of millions of gallons of water from streams and rivers in the Delaware River Watershed will change the ecology of the river ecosystems.

Development of roads to support construction vehicles is a secondary impact of drilling projects. Each well will destroy 15 acres of forest and need a half mile of roadway. There are currently proposals for more than 50,000 wells. This could mean the removal of 750,000 acres of woodlands and 25,000 miles of road. Truck transport of process water and waste fluids will carve through our natural areas. This will fragment the forest inviting in invasive species and altering the ecosystem. In addition, truck transport will result in runoff and pollution of the areas surrounding the roadways.

Finally, the Upper Delaware River is a Scenic and Recreational River. This is a Congressional designation based on the rivers outstanding natural values and resources, including watershed, habitats and tributaries. Impact on the river and its resources must be taken into consideration when drilling projects are being reviewed.

While the Sierra Club realizes the importance of natural gas as an energy alternative to coal, we need to ensure that the environment and the public health are protected. Industry regulations must be developed and implemented before corporations like Stone Energy are allowed to initiate drilling in the Delaware River Basin.

We strongly encourage the Delaware River Basin Commission to deny these permits. If you would like to discuss this issue further please contact me directly.

Sincerely,

Jeff Tittel



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CC:

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