



## VALLEY FORGE CHAPTER of TROUT UNLIMITED

Carol R. Collier  
Executive Director  
Delaware River Basin Commission  
25 State Police Drive  
P.O. Box 7360  
West Trenton, NJ 08628-0360

Dear Ms. Collier,

I am writing on behalf of the 725 members of Valley Forge Chapter of Trout Unlimited to ask the Delaware River Basin Commission to postpone the approval of Stone Energy Corporation's Marcellus Shale gas drilling permit applications in Wayne County, Pennsylvania. I urge the DRBC not to issue any permits for Marcellus Shale gas drilling activities in the Delaware River watershed until it has adopted 1) new regulations that include an analysis of, and take into account, the anticipated cumulative impacts of all gas drilling activities in the Delaware River watershed, and 2) an ecologically protective flow management plan for the Upper Delaware River.


DRBC must also require Stone Energy Corporation to submit Non-Point Source Pollution Control Plans for both permit sites that meet the anti-degradation water quality requirements of Special Protection Waters. These plans should have been made part of the public hearing process.

The Upper Delaware River watershed is one of the finest wild trout fishing destinations in the East and is part of the DRBC's designated Special Protection Waters. Specifically, the West Branch of the Lackawaxen River, where surface water withdrawal is proposed at a rate of 700,000 gallons per day, is classified as a high-quality, coldwater fishery by Pennsylvania's Department of Environmental Protection.

The Pennsylvania's Department of Environmental Protection is in the process of making changes to its regulations governing oil and gas well construction. No permits should be issued until these regulations go into effect. Pennsylvania's Department of Environmental Protection is also in the process of amending its wastewater treatment requirements, including the establishment of new effluent limits for new wastewater sources such as flowback water from hydraulic fracturing. No permits should be issued until these requirements go into effect.

It is the responsibility of the DRBC to ensure proper management and protection of the Delaware River basin's water resources, especially those listed as Special Protection Waters. As such, it is the sole responsibility of the DRBC to complete the proper scientific analyses and put in place adequate regulations before making decisions that could negatively impact the Delaware River basin's water resources.

Sincerely,

  
James W. Nelson  
President Valley Forge Chapter of Trout Unlimited

