

SCRIP's Position Paper for Hydraulic-Fracturing (Marcellus Shale)

The Stonycreek-Conemaugh River Improvement Project (SCRIP) understands that natural gas drilling and other energy developments are a crucial part of the Commonwealth's economy; however, SCRIP has poured too much into reclaiming our waterways from last century's energy boom, and with many streams still impacted from 19th and early 20th century coal mining, we can not afford to take steps backward. The Stonycreek and the Conemaugh Rivers were **devoid of life** for many of their miles 20 years ago. The Conservation Districts of Cambria and Somerset Counties realized without improvement of our region's water resources, attracting new business, tourism and recreation would not be possible. SCRIP was created to accomplish what many believed could not be done. Recent surveys of the Stonycreek illustrate that its water quality has significantly improved over the past 20 years and strides are being made on many Little Conemaugh headwater streams to continually improve its water quality also.

SCRIP's concern with Hydro-fracking of Marcellus Gas is the potential of catastrophic loss of our hard earned gains, many of which have been developed and constructed with millions of tax payer dollars. Although SCRIP was originally created to deal with abandoned mine drainage (AMD) abatement it cannot overlook new more recent water quality issues that can undo all of the positive impacts and monetary investment of SCRIP's previous and current efforts. SCRIP feels as stewards of the waters, of other natural resources and of **taxpayer investments** there are a number of concerns that need addressed.

Therefore, the SCRIP Board of Directors recommend the following:

Foremost the passage of a state severance tax is a must to reduce the natural resource impacts of Marcellus Shale gas drilling in the Stonycreek and Conemaugh River basins and the rest of the Marcellus Shale fields in the state.

1. Regulatory agencies must actively ensure that **all** regulations be enforced to protect our water resources afforded under the Clean Water Act and the Clean Streams Law.
2. A rush to permit **will lead to oversight** failure. All erosion and sedimentation permits in the Stonycreek and Conemaugh watersheds should be approved, reviewed, and overseen by the respective Conservation Districts. DEP should make copies of completed permits, including water management plans, and provide them to the conservation districts. Best Management Practices (BMPs) should be demanded and inspected regularly.
3. The removal of millions of gallons per well can cause water quantity problems such as increased acidity levels from abandon mine pools, especially during low water events. DEP should do a watershed-wide

- water **quantity** hydrologic analysis of both the Stonycreek and the Conemaugh River basins before issuing permits.
4. Water withdrawals need to cease when counties are in a drought warning or watch.
 5. Drinking water suppliers should be offered ample time to comment on development in their recharge areas. In fact, drilling should not be allowed in recharge areas.
 6. **Surface and groundwater contamination from chemicals** pose serious environmental and human health concerns. The proprietary nature of the frack water should not supersede the health of the residents of the SCRIP drainage area. Currently, the oil and gas industry is exempt from complying with the Safe Drinking Water Act. This exemption (the Haliburton loophole) should be eliminated and EPA given the authority to regulate hydraulic-fracturing.
 7. **Lack of wastewater treatment options** to deal with the significant industrial pollution of unknown chemicals in a brine solution is a time bomb waiting to happen. Technologies are **not** in place to meet the need to deal with the wastewater, and current wastewater facilities are not up to par to distill the industrial waste from wells, as this is the only true solution to this form of pollution. Discharging this wastewater into our recovering rivers is **very different** from the mine seepage and discharges we are used to dealing with. In the case of hydraulic fracturing waste disposal, **the solution to pollution is NOT dilution.**
 8. Air quality monitoring must be established, with regular reports provided and advisories issued if needed. The public needs educated on the potential health impacts of this industry.
 9. More water quality and quantity monitoring should be done upstream and downstream of wells, with data **readily** available to the public.
 10. **Bonding for gas sites is inadequate and must be increased to cover future costs** much like in coal mining in our basin or the taxpayers end up footing the bill. **Taxpayers have paid for the clean up of abandoned mines** and for recent mines. The strain will be too great with an influx of gas drilling to save our streams unless there is a substantial bond to insure the best extraction possible. All too often, it is too easy for big companies to walk away from a bond **and leave the clean up bill to the taxpayers, again.**
 11. **Drilling Activities in Special Protection Watersheds** (HQ and EV streams) is of special concern. Many of our watersheds are recovering from the last energy boom and any drilling in these watersheds needs to look at where these waterways have just recently emerged from and where they are heading. Special restrictions, with no exemptions, to limit drilling in these watersheds are strongly encouraged.
 12. Further, drilling on public lands needs to be limited and more closely regulated, as these lands should remain natural for those who wish to recreate outside.

13. Counties and local municipalities should consider utilizing zoning to put limits or restrictions on the areas that are the most likely to suffer from harm from gas drilling and focus the activity in areas that are more conducive to industrial development.
14. In order to track shipment of both clean and frack disposal water, GPS units should be installed on the transport trucks. This will allow both the companies and the regulatory agencies to better manage the water withdrawals, as well as the water disposals.
15. Farmland that has already been enrolled into the county and state Farmland Preservation Program and where the owner have received payments for so doing should not be permitted to have any type of Marcellus Shale gas drilling permitted on the land enrolled in the program. The concept of the program is to preserve not industrialize. Additionally, land protected by conservation easements should not be developed for any reason, much less Marcellus Shale gas extraction.
16. The idea of force pooling is appalling and should not be approved. Land and mineral rights should not be taken away from property owners to benefit private industry.