

Date

DEP Regional Office

Re: Permit WMGR123-XXXX

To Whom It May Concern:

I am writing to express my support for the above-referenced WMGR123 Residual Waste General Permit.

Notice of this permit previously was provided for in the *Pennsylvania Bulletin*. However, the Pennsylvania Department of Environmental Protection (PA DEP or Department) has decided to conduct another public comment period on nearly 60 WMGR123 Residual Waste General Permits, despite a public comment period never being contemplated for use of such a general permit. Furthermore, the decision to open these permits for another comment period was made between the PA DEP and a number of special interest groups without any input from the permittees themselves. This action has created significant uncertainty within the regulated community. It is imperative that the Department proceed expeditiously so that these permittees – the vast majority of which have been safely operating their facility for several years – can have the certainty that they deserve and envisioned when the Department issued this permit.

As you know, in 2011 the unconventional natural gas industry voluntarily stopped taking wastewater to publicly-owned treatment facilities for discharge. This permit, therefore, is critical to facilitating the reuse and recycling of flowback and produced water from unconventional natural gas facilities. Operators' use of these permits have enabled the industry at large to recycling more than 90% of its flowback and produced water, with some companies recycling an even greater percentage as they process and recycle water from their industry colleagues.

In addition to significantly reducing the amount of freshwater used in natural gas operations, successful operation of these residual waste facilities reduces truck traffic on local roads, resulting in enhanced safety for local residents as well as improved air quality from fewer vehicle emissions.

As the Department's own permit name implies, the WMGR123 general permit facilitates the *beneficial* use of wastewater. These permits are beneficial for the operator, for the environment, and for the local community. For these reasons, I am pleased to express my support for this above-referenced permit.

Sincerely,