



February 25, 2022

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

Re: Proposed Rulemaking: Importations of Water Into and Exportations of Water From the Delaware River Basin; Discharges of Wastewater from High Volume Hydraulic Fracturing and Related Activities. *Submitted electronically via www.nj.gov/drbc*

To Whom It May Concern:

The Marcellus Shale Coalition (MSC), a regional trade association with a national membership, was formed in 2008 and is currently comprised of approximately 110 producing, midstream, transmission and supply chain members who are fully committed to working with local, county, state and federal government officials and regulators to facilitate the development of the natural gas resources in the Marcellus, Utica and related geological formations. Our members represent many of the largest and most active companies in natural gas production, gathering, processing and transmission in the country, as well as the suppliers, contractors and professional service firms who work with the industry.

On March 29, 2018, the MSC submitted a 71-page comprehensive letter with significant supporting documentation regarding the Delaware River Basin Commission's (DRBC or Commission) natural gas development moratorium. Significant effort, thought and expense went into the preparation of these comments, which were then summarily dismissed and ignored by the Commission. We will not repeat a similar effort here, as doing so would be an inefficient use of valuable time for our member companies and their dedicated employees.

Sadly, the Commission has trampled on constitutionally protected private property rights and ignored sound science and our industry's leadership in water recycling and reuse technology. Pioneered in Pennsylvania, 93 percent of water used by the Commonwealth's unconventional natural gas industry is recycled, dramatically reducing the need for freshwater withdrawals. While the DRBC Commissioners advance priorities of environmental extremists, a decade of evidence from the neighboring Susquehanna River Basin demonstrates that safe, responsible natural gas development has no detrimental effect on water quality or quantity.

These are the facts, as politically inconvenient as they may be for you.

Sincerely,



David E. Callahan
President

cc: Governor Tom Wolf, Member, DRBC Board of Commissioners