



Upper Delaware Council

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December 3, 2009

Mr. Jack K. Dahl, Director
Attn: dSGEIS Comments
Bureau of Oil & Gas Regulation
NYSDEC Division of Mineral Resources
625 Broadway, Third Floor
Albany, NY 12233-6500

RE: Comments on the NYS DEC Draft Supplemental Generic Environmental Impact Statement (dSGEIS) on the Oil, Gas, and Solution Mining Regulatory Program

Dear Mr. Dahl,

The Upper Delaware Council (UDC) offers these additional comments regarding the New York State Department of Environmental Conservation Draft Supplemental Generic Environmental Impact Statement (dSGEIS) on the Oil, Gas, and Solution Mining Regulatory Program, dated September 2009. Our previous comment letter is dated November 5, 2009. Thank you for extending the comment deadline.

With the potential for hazardous material spills and industrial accidents that natural gas extraction activities present, the drilling companies, at their own expense, should be required to coordinate with local, state, and federal emergency response officials, and to provide hazmat training and any necessary specialized equipment to local emergency first responders, including fire and ambulance companies, and hospitals. Such entities should be notified in advance and made knowledgeable of all the chemicals used in fracking fluids and waste material at each individual well site for the safety of those they serve and themselves. Each well pad should have an address to identify its location. Other potentially hazardous sites, such as compressor stations and pipeline segments, should also be identified to assist emergency first responders.

If hazardous materials or waste products are to be transported by train, the drilling companies should be required to provide additional coordination and training with the emergency response officials and railroads to assist emergency first responders. It is critical that everyone know exactly what hazardous materials are involved should an incident ever occur.

We reiterate our call for the NYS DEC to act in compliance with the guiding principles of the River Management Plan for the Upper Delaware Scenic and Recreational River.

Working together to conserve the Upper Delaware Scenic and Recreational River

*Town of Hancock • Town of Fremont • Town of Delaware • Town of Cohecton • Town of Tusten • Town of Highland • Town of Lumberland
Town of Deerpark • Lackawaxen Township • Shohola Township • Westfall Township • State of New York • Commonwealth of Pennsylvania
Delaware River Basin Commission • In partnership with the National Park Service*

Sincerely,



George J. Fluhr,
Chairperson

cc: Hon. David A. Paterson, NY Governor
Hon. Charles Schumer, US Senator, NY
Hon. Kirsten Gillibrand, US Senator NY
Hon. Maurice D. Hinchey, Jr., US Congressman, 22nd District NY
Hon. John Hall, US Congressman, 19th District NY
Hon. John Bonacic, NY State Senator, 42nd District
Hon. Aileen M. Gunther, NY State Assemblywoman, 98th District
Hon. Clifford W. Crouch, NY State Assemblyman, 107th District
Hon. Edward G. Rendell, PA Governor
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Hon. Robert P. Casey, US Senator, PA
Hon. Christopher Carney, US Congressman, 10th District PA
Hon. Lisa Baker, PA State Senator, 20th District
Hon. Michael T. Peifer, PA House of Representatives, 139th District
Hon. Sandra J. Major, PA State Representative, 111th District
Carol Collier, Executive Director, Delaware River Basin Commission
Pete Grannis, Commissioner, NYS DEC
William Janeway, Regional Director, NYS DEC - Region 3
Steve Schassler, Regional Director, NYS DEC - Region 4
William Rudge, NYS DEC and UDC Rep.
Michael Flaherty, NYS DEC and UDC Alternate
Dennis DeMara, PA DCNR and UDC Rep.
Gary N. Paulachok, Deputy Delaware River Master, USGS
Mayor Michael R. Bloomberg, New York City
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Norfolk Southern Railway Company
Nathan R. Fenno, President and CEO, New York, Susquehanna & Western Railway
and Central New York Railroad Corporation
Dan Wenk, Acting Director, National Park Service
Dennis Reidenbach, Northeast Regional Director, National Park Service
Sandra Schultz, Acting Superintendent, National Park Service - UDSRR
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