

**Marcellus Shale  
PWD Position Paper  
February 2011**

One of the Philadelphia Water Department's (PWD) core missions is the provision of safe, high quality drinking water to our nearly two million customers in the Philadelphia region. Philadelphia's drinking water sources are the Delaware and Schuylkill rivers, and our pledge to our customers extends to the stewardship of our region's water resources. To this end, PWD has embraced a watershed protection approach that tracks and evaluates events and practices that may cause immediate or long term impacts on water quality. It is with an eye towards potential long term repercussions that PWD is closely following the discussions surrounding natural gas drilling.

Our watershed protection ethic is not new. We have been a leader in this holistic practice since the mid nineteenth century, when the Fairmount Park system was formed to protect the Schuylkill River from pollution. Today, watershed protection is a core function of the department as we have championed regional watershed planning with our upstream municipalities and counties to develop a sustainable plan that addresses water quality – and quality of life – for everyone in the Delaware and Schuylkill watersheds. We have completed drinking water protection plans that look at the chronic and acute impacts of:

- New and redevelopment and the impact of clearing of natural lands
- Acid mine drainage
- Aging sewer infrastructure
- Agricultural practices on water quality
- Volume demand in growing communities and utilities
- Accidents and spills involving hazardous materials

Natural gas drilling - because it is a new technology in the Delaware River Basin with still evolving regulations around all aspects of water quality protection - has our full attention. At this point in time, we believe that the current regulatory framework, if enforced, is adequate to protect our water supply from immediate threats. We are watching, monitoring and evaluating upstream activities. If something appears to be imminently dangerous to our water supply, we will raise alarms.

The Water Department has communicated and is in continual discussion with the Environmental Protection Agency (EPA), the PA Department of Environmental Protection (PADEP), and the Delaware River Basin Commission (DRBC) concerning our water supply concerns relating to Marcellus Shale drilling. We have shared with our regulating partners that we expect complete respect by the natural gas industry of current and future regulations designed to protect our water resources and public health.

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However, the long-term impacts from drilling on the water quality of the Delaware Basin are not well understood. In particular, the impacts of wastewater discharge on drinking water quality – even under the improved regulations under the state’s wastewater treatment requirements – are not known. With this in mind, PWD is requesting the following actions before drilling is allowed to take place in the basin:

1. Advanced notification of accidents and spills relating to Marcellus Shale (i.e., a commitment by all dischargers, facilities and transporters of wastewater from fracturing to join the Delaware Valley Early Warning System).
2. Baseline monitoring to observe long-term impacts with funding support from the gas industry.
3. No discharges of wastewater from fracturing above Philadelphia’s intakes on the Schuylkill and Delaware Rivers.
4. Restoration and reforestation of all lands that are impacted by gas drilling and related activities, including access roads, when drilling is complete, as required on state game lands and forests.
5. A cumulative impact study of the long-term implications of natural gas drilling for Philadelphia’s drinking water supply.
6. A task force to help guide items 1-5. The task force should represent a diversity of stakeholders including the gas industry.
7. A commitment by DEP and DRBC to consider the recommendations from the cumulative impact study and to update regulations accordingly.

Rest assured, we will continue to be a leader in watershed protection and to uphold our pledge to our citizens to provide them with safe, top quality drinking water and to protect and preserve the water resources of our region.