From:	McDonald, Jeffrey
To:	"Gilmore, Tyler J"
Cc:	Greenhagen, Andrew
Bcc:	Bayer, MaryRose; Smith, Robert H; Akhavan, Maryam
Subject:	2/25/14 phone memo
Date:	Thursday, February 27, 2014 3:08:00 PM

Tyler,
Thanks again for gathering some of your colleagues together for our call on Tuesday. Below is a summary of our discussions. If I have stated anything in error, please let me know.
Jeff

- P&A plan: The one gel spacer/plug was intentionally left out of the injection well P&A plans. We advised that the final P&A plans should include that spacer/plug and that they need to be signed. The P&A plans for the monitoring wells look fine, but they need to be signed. Since the proposal is for four permits, each permit would have one original injection well P&A plan (form 7520-14) and each permit would have all 8 monitoring well P&A plans. You can send in one signed form each and we can copy them across all the permits (if issued).
- ERR plan: You said that this seemed in good shape and you just wanted to cross reference it with the other plans for consistency.
- Monitoring network: FGA is proposing a third RAT well in the SE area of the projected plume area. This well was originally considered, but has been left out up to this point due to the lack of landowner agreement. That issue has been resolved so it is part of the planned monitoring. This revised monitoring well will have to be added to the Testing and Monitoring plan as well as the PISC plan. You told us that the cost was already set in the FR so there won't need to be alterations of the proposed trust fund due to adding this well.
- AOR evaluations are planned for annually until year 5 of a permit (or was it year 5 of injection) and then every 5 years thereafter
- Things that would trigger AOR evaluations
    - Pressure > 90% of fracture pressure is encountered
    - Observed changes above cap rock indicating a problem
    - Anomaly in the plume development
    - Increase microseismicity
- Testing and Monitoring plan; a full suite of analytes should be in the proposed testing. This can be reduced in the future as a greater understanding of the value of various parameters is evaluated
- Comp. model was run with perfs going up the curve. Graphics etc. will be match that.
- QASP; following ADM example; will be part of T&M plan although an independent document.
- PNNL will do a cross check of the plans they have and get them to EPA on Monday, 3/3/14.
- Still awaiting insurance language.

Jeffrey R. McDonald, Geologist
Underground Injection Control Branch
U.S. EPA - Region 5

(312) 353-6288 [office]
(312) 408-2240 [direct fax]
mcdonald.jeffrey@epa.gov