Message

From: Greenhagen, Andrew [Greenhagen.Andrew@epa.gov]
Sent: 4/16/2019 9:23:40 PM
To: Urchel, Raymond [urchel.raymond@epa.gov]
Subject: RE: Question Regarding Bonding

FYI: The EPA bonding will change when the permit is transferred.

From: Urchel, Raymond
Sent: Tuesday, April 16, 2019 9:13 AM
To: Pettit, Joe (DEQ) <PETTITJ@michigan.gov>
Cc: Greenhagen, Andrew <Greenhagen.Andrew@epa.gov>
Subject: RE: Question Regarding Bonding

2. Irrevocable letter of credit 2559 is in our database. DK the amount yet.

From: Urchel, Raymond
Sent: Friday, April 12, 2019 4:50 PM
To: Pettit, Joe (DEQ) <PETTITJ@michigan.gov>
Subject: RE: Question Regarding Bonding

So, my questions are:

1. **Can the EPA permit be held by an owner who has a different operator at the state level? A: Yes.**
2. **What is the bond amount and type that EPA has on record for the Chudy 2 BDW? A: Ray will check.**
3. **Does EPA have any concerns about transfer of the State permit to Columbus Oil and Gas? A: No. Mr. Lawrence has worked to remain in compliance. [RU]**
4. **If Stephens and Soldwisch is the EPA Permittee and Columbus Oil and Gas is that state permittee, would the Chudy 2 be considered a commercial disposal well? A: Depends on the injectate. EPA shows Northeastern as the permittee still.**

From: Urchel, Raymond
Sent: Friday, April 12, 2019 2:25 PM
To: Pettit, Joe (DEQ) <PETTITJ@michigan.gov>
Subject: RE: Question Regarding Bonding

Sit tight. Let me talk to Lisa today. Ray Urchel

From: Pettit, Joe (DEQ) [mailto:PETTITJ@michigan.gov]
Sent: Friday, April 12, 2019 2:21 PM
To: Urchel, Raymond <urchel.raymond@epa.gov>
Subject: RE: Question Regarding Bonding

No.

Another issue comes to mind as well. If Stephens and Soldwisch is the EPA Permittee and Columbus Oil and Gas is that state permittee, would the Chudy 2 be considered a commercial disposal well?

Joe Pettit
Compliance & Bonding Specialist
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From: Urchel, Raymond <urchel.raymond@epa.gov>
Sent: Friday, April 12, 2019 3:20 PM
To: Pettit, Joe (DEQ) <PETTITJ@michigan.gov>
Subject: Fw: Question Regarding Bonding

Joe: Did you get any answers to these questions? Ray Urchel

From: Pettit, Joe (DEQ) <PETTITJ@michigan.gov>
Sent: Wednesday, April 10, 2019 8:26 AM
To: Urchel, Raymond; Perenchio, Lisa; Hansen, Janette
Subject: Question Regarding Bonding

Not sure who to ask so I am casting a wide net....

Columbus Oil and Gas, Inc. recently performed an MIT on the Chudy 2 BDW in St. Clair County, MI on behalf of Stephens and Soldwisch Oil and Gas Properties LLC. According to Charlie Lawrence (Columbus Oil and Gas) the EPA permit for the Chudy 2 well is held by Stephens and Soldwisch Oil and Gas. Presumably, EPA has a bond on record for the Chudy 2 BDW. Can you confirm that EPA has a bond on file for the Chudy 2 BDW.

We are in the process of approving transfer of the State permit to Columbus Oil and Gas. Columbus has a $250,000 blanket bond that covers 55 wells. The state permit will be bonded by Columbus' blanket bond.

So, my questions are:

1. Can the EPA permit be held by an owner who has a different operator at the state level?
2. What is the bond amount and type that EPA has on record for the Chudy 2 BDW?
3. Does EPA have any concerns about transfer of the State permit to Columbus Oil and Gas?

Joe Pettit
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