EPA

Moderator: Cindy Cook
February 02, 2021
6:00 p.m. ET

OPERATOR: This is Conference # 9774854

Operator: Thank you for standing by and welcome to the Roulette UIC Public Hearing Conference Call.

At this time, all participants are in a listen-only mode. During the public hearing session, you will need to press "star" "1" on your telephone to ask a question, and please state your first and last name. Please be advised that today's conference is being recorded.

I would now like to hand the conference over to your speaker today, Mr. James Bennett. Sir, you may begin.

James Bennett: Thank you, (Sarah). Good evening, ladies and gentlemen. I'd like to call this public hearing to order. Thank you for your attendance tonight. This is a formal public hearing on a proposed permit renewal under the federal Underground Injection Control program or a UIC program for a project consisting of one brine disposal well known as the Roulette Oil & Gas Company injection well, Clara Field Number 20 in Potter County, Pennsylvania.

Public notice for these – for this permit was distributed to interested parties who have written or called EPA published in the Potter Leader-Enterprise on December 31, 2020, and posted on EPA's Web site. I ask for your cooperation

in adhering to the procedures I will outline for you shortly so that we may make the most out of this opportunity for public comment.

First, however, I will introduce myself and other members of the UIC section in attendance tonight. I am James Bennett, Chief of the Source Water & UIC Section of the water division located in the U.S. Environmental Protection Agency's office in Philadelphia, Pennsylvania. On the call tonight are Kevin Rowsey, our Permit Writing Lead, and Dave Rectenwald, our Class 2 Injection Lead Inspector.

For those of you who are here today at a general environmental interest and concern, I like to acquaint you with the basic goals of the UIC program, which EPA is administering in the Commonwealth of Pennsylvania.

The federal Safe Drinking Water Act of 1974 and its amendments recognize the importance of safeguarding our nation's drinking water supplies in a number of ways. Our program – our program authorized by the act – one program authorized by the act is the Public Water System Supervision Program, which is designed to ensure that public water supplies deliver safe drinking water to their users.

This program is currently being operated by the PA Department of Environmental Protection. Congress also recognized at the time of the law's enactment that our groundwater resources, which supply approximately half of our national drinking water resources, also needed protection from potentially harmful practices such as underground injection of fluids.

Sections 1421 through 1424 of the Safe Drinking Water Act addresses the provisions which authorized the UIC program and covers the procedures under which EPA must implement a federally administered program in those states such as Pennsylvania whenever a state will not or cannot assume primacy enforcement for the program.

Since June of 1984, EPA has been enforcing the federal UIC program in Pennsylvania. The program addresses a variety of different types of classes of injection wells, including nearly 1,500 oil and gas-related wells in Pennsylvania.

The objective of the program and permits authorized under it are to ensure that the construction and operation of these wells provides the highest level of protection to underground sources of drinking water.

Underground sources of drinking water for USDWs are basically defined as those aquifers which supply or could supply drinking water for human consumption. The regulatory definition of a USDW also includes consideration of both the quantity of water available and its quality. It protects all groundwater with less than 10,000 parts per million total dissolved solids in order to allow for future uses of the resource.

Any and all new injection wells constructed after June of 1984 are required to apply for an EPA permit to ensure compliance with the construction and operational requirements to safeguard our groundwater resources.

It is our intent to enforce the provisions of the UIC program for Pennsylvania to enhance and protect the commonwealth's groundwater resources by assuring injection operations to meet protected standards mandated by the UIC program.

I would like to clarify the need for a federal program on this issue and the relationship to state and local authorities. EPA's program is designed to protect groundwater resources through stringent casing, cementing, testing, and continuous monitoring requirements. It is a program which seeks to address many of the concerns you have for prevention of water supply contamination as well as protection of other natural resources.

The UIC program, however, does not address or had jurisdiction to enforce against such issues as noise, air emissions, truck traffic or sighting related to residential buildings that you may also have concerns about.

The UIC permit does – excuse me. The UIC permit does contain a condition that requires an operator to meet all the required local and state laws. A UIC permit does not override local or state regulations.

The purpose of the UIC permitting process for existing and new wells is to control and prevent any injected fluids from endangering underground sources of drinking water. All injection operations must comply with the construction, operation, monitoring, and reporting requirements specified in the UIC regulations.

The specific technical requirements for construction of the well, maximum injection pressure limitations, and corrective action plan in the area of review, which is required to address any unplugged wells which penetrate the injection formation and which may serve as conduits for fluid migration are all designed to ensure that injected fluids are contained within the well and the intended injection zone.

The EPA has several mechanisms for identifying noncompliance and has made a commitment to enforcement of permit conditions and the overall program provisions. EPA routinely inspects all facilities to assist in evaluating compliance by regulated facilities.

In the case of a violation, the severity of the penalty will be based on the seriousness of the violation. Violators of the UIC regulations are subject to either civil or criminal penalties. Parallel state enforcement authorities and the commonwealth oil and gas regulations may afford additional protection.

Now, having supplied you with a brief overview of the UIC program and purposes of this public hearing, I would like to briefly explain the protocol and procedures which govern this hearing. Persons wishing to testify will be unmuted by the operator.

In presenting oral testimony, we ask that you clearly identify yourself and your organizational affiliation, if any. I stress the fact that this hearing is not a debate or a dialog. We will not be responding to your comments or questions because the purpose of this – of us being here tonight is to formally solicit your input on the permit proposal before us.

For those of you who wish to provide a copy of your testimony in writing, we ask that you supply us with a copy of the record of this hearing, and if possible, we would also appreciate a summary of your points.

Copies may be – copies may be made and sent in no later than March 4, 2020. We had extended the public hearing – I mean the public comment period for 30 days, expiring on March 4, 2020. Please send your written testimony in care of Kevin Rowsey, mailed to US EPA Region 3 1650 Arch Street Philadelphia, Pennsylvania 19103 Mail Code 3WD22, or email to rowsey.kevin@epa.gov. That is R-O-W-S-E-Y.K-E-V-I-N@epa.gov.

For those of you providing oral testimony today, please also send your email or mailing address to Kevin Rowsey so we can share the written response to comments with you directly. You can share your contact information by emailing Kevin at, once again, R-O-W-S-E-Y.K-E-V-I-N@epa.gov or by calling Kevin at 215-814-5463. Thank you. And with that, (Sarah), I would like to open the line to the interested parties.

Operator: As a reminder, to ask a question or to give testimonies, you will need to press "star" "1" on your telephone. To withdraw your question, press the "star" key. And please state your first and last name. Again, if you would like to ask a question or to give testimonies, you will need to press "star" "1" on your telephone keypad.

[redacted] My name is [redacted]. I'm one of the supervisors from Clara Township. I'd like to thank you for giving us the opportunity to make our concerns known. My number one concern as a resident of Potter County Clara Township is the drinking water.

And in the public notice that was sent out to Clara Township, it states that EPA requests public comment on its findings that the proposed injection activity under the draft permit is unlikely, using that highlighted word unlikely to pose a risk to the underground drinking water.

I believe in using the term unlikely means there is a possibility or a likelihood of a leak or contamination. In the event of a catastrophic failure, who would be held responsible for this, for the cleanup, the cleanup of the spill? How quickly will the EPA respond? What impact is this catastrophic event, let's say, going to have on our streams, our ecosystems, our wildlife?

I'm asking this because of the company and its failure to file all the EPA and EPA documents that are required in the past years. These are concerns of mine because if they're not filing the proper documents on the wastes, well management requirement forms, how do we know they're going to take care of the spills or leakage in the proper manner? Again, [redacted], Clara Township Supervisor. Thank you.

James Bennett: [redacted], thank you for your comments. And, (Sarah), if there is another speaker, you can feel free to open the line.

Operator: [redacted] your line is open.

[redacted] Yes. Good evening and thanks for the opportunity to address the issues and the concerns of the injection wells here in Clara Township. As I said, my name is [redacted] and I live at 530 West Branch Fishing Creek Road in Roulette, PA in Clara Township.

We're located about a half a mile South of the proposed injection well here in Clara Township. And myself and other family members, we have over 1,000 acres that could be affected by this permit.

And we do support the natural gas and oil development in our area. And I know that the area has been up for discussion for quite some time. I see that the application was made in September. And we, as the resident's real close to the well, we were only notified about two weeks ago. So, we really haven't had the opportunity to address our concerns.

What I'm interested in would be A, an extension of time so we would have the opportunity to have somebody represent us, perhaps maybe a geologist or somebody that would be knowledgeable and professional in this concern that we have. So, what I would be really asking is an extension of time for us to reply and have somebody address our concerns professionally.

So, that being said, really, what we have here is, on our 1,000 acres, we have several family members and other rental properties that I have. All of them are serviced by shallow springs. We have no wells on our property. We have gas

wells on our property, but all of our water sources come from our own private sources.

We do have an artesian well on our farm. We supply a six-inch waterline to the Roulette Fish & Game Club that raises trout on our farm. It's all volunteered. So, obviously, we're very concerned. We have a lot of members here in our community.

Pretty much everybody has a spring, and we're downhill about a half a mile away from the injected well, but we need to have somebody represent us with the expertise to question and set our minds at ease. So, that being said, I thank you for the time and opportunity and wish everybody well. Thank you.

James Bennett: Thank you. And I don't know if you heard at the beginning of the opening but I was going to mention too, we did extend the public notice period till March 4th in order to give another 30 days above the 30 days that was originally public noticed. So, we're asking for and accepting comments up to March 4th on this permit. Thank you. (Sarah), if there's another speaker, feel free to open the line.

Operator: [redacted], you may ask your question.

[redacted] Yes, can you hear me?

James Bennett: I can. Can you just say your first and last name for the record?

[redacted] Can you hear me?

Female: I can hear you.

[redacted] OK.

Female: First and last name.

[redacted] Yes. [redacted], that's [redacted]. We're residents of Clara Township Potter County since 1988. And thanks for the opportunity to make some comments, and I'll be brief, and I've already sent these comments in, but we want to voice our opposition to this well permit.

Number one, groundwater contamination from drilling-related activity is a very serious concern in our area. And in this industry, there exists a very long list of infractions, violations, fines and penalties under permitted activities.

The public has no reason to believe that this project will be any different. It's been recognized that poor areas and populations pay a disproportionately larger social cost of these projects, which was forced on them by industrial operations. These operations jeopardize people's health and safety in the name of profit. What profit will any residents realize from this endeavor? It's a classic example of such discrimination.

Last of all, there is a serious concern that our area will become a dumping ground for toxic wastes. So, that's – those are my comments. Thanks for taking them. I'm finished.

James Bennett: Thank you for your concerns and comments. (Sarah), if there's another caller, feel free to open the line.

Operator: [redacted] your line is open.

[redacted] Hi. I would like to thank you for the opportunity to comment on the proposed injection well. And my concern is based around the past waste management practices of Roulette Oil & Gas.

I'm familiar with the DEP's database and I'm able to locate authorizations for activities that require permits. I can't find permits that authorized eight injection wells that are already in Roulette Oil & Gas' inventory.

Furthermore, they haven't been inspected in 27 years. There were armchair inspections done last spring but there hasn't been eyes set on these injection wells that are already permitted to Roulette Oil & Gas since 1993.

Another concern of mine is their waste management – their waste management disposal methods. I was able to download the waste management reports that were submitted by the operator, and I found that 102 times waste was encapsulated onsite. Normally, this is a permitted activity. And so, I

would like to know if this is in compliance with the Clean Streams Laws. I can't find any permits that authorized this method of disposal.

Another method of disposal they have listed, 101 times, is storage pending reuse. This isn't a waste disposal method. This is – this isn't – this isn't clear what happened to the wastes from these wells. So, I'd like – I'd like to know if this is compliant with federal laws, the Clean Streams Laws. Thank you for the opportunity to comment.

James Bennett: Thank you as well. And (Sarah), this is Jim, again, you can feel free to open the line.

Operator: [redacted] your line is open. Excuse me. [redacted] your line is open.

[redacted] No comment.

Operator: Next is [redacted]. Your line is open.

[redacted] Thank you for taking my call this evening. My concern is – my name is [redacted] I am a Supervisor in Clara Township. And I'm concerned for our waters as previous people had stated on these wells not being inspected in the past few years.

I've done some research and some of it that I come up with shows a number of wells that breached within the first year. And Potter County, here in Clara, we are noted for people coming up to their camps, hunting, freshwater, fishing.

And my concern is, if we go ahead and the EPA permits and allows Roulette Oil & Gas to go ahead and have this permit to put this injection well in, I'm just concerned about the toxic waste that is going to come in to our waterways.

Basically, everybody else that has called in has covered most of everything, but that is my concern also, is our waterways, and these wells are not secure for this kind of permitting. Thank you.

James Bennett: Thank you for your comment. (Sarah), feel free to open the next caller.

Operator: Next is [redacted]. Your line is open.

[redacted] Hi. My name is [redacted] calling both as Editor of Public Herald, which is out of 606 Center Street Pittsburgh, PA 15221, and as the Director of INVISIBLE HAND, which is a documentary film that covers Grant Township, which is an area that has banned injection wells and has kept them out of their community since 2014.

The comments that I'm making tonight are in regards to a couple things, first and foremost, the history of injection wells in Pennsylvania, which as far is the best, and there's a reason for that, and that's that the majority of the science has been conclusive about the strata in Pennsylvania, and that strata is not suitable for injection wells.

It is not the same kind of strata as a place like Oklahoma or Texas where there are thousands of these wells, absolutely thousands. Pennsylvania has less than 50. I think the total from what I know in 2019 data for Class 2 injection wells was 13, and that doesn't include Potter County for Class 2 injection wells.

So, you can see how fragile the situation is here. And the only reason that that's changing at this moment is because of the vast quantities of wastes that are being produced in the Marcellus Shale and DEP's position on this. And the DEP's position on this is that they want more injection wells in Pennsylvania because they don't have places to take this waste right now, which they feel are cost-effective for their industry.

Now, this gas company and other gas companies could start taking this waste to Eureka Resources, for instance, and they can perform the distillation process and potentially have a safer solution at the end of that result, and that would be you know, the common sense way of handling this waste.

And why would they need to do that is because you're dealing with either – because if it's conventional or unconventional way, to keep in mind, Roulette Oil & Gas is a company that has both conventional and unconventional. There is no oversight system in place to prevent Roulette Oil & Gas from mixing their unconventional, which is the Marcellus Shale radioactive fluids that

come out of these wells, with the conventional shale radioactive fluids that come out of these wells.

And that's one of the big concerns, is that you're dealing with a trust system here, and the trust is with this company, which has been said that has a long history of little oversight or none at all and also violations, and the trust with the state agency. So, there are two flags right there.

The third flag is the radioactivity in the fluid itself. If this gets into people's well, that type of radium that's inside of the conventional fluid, according to 2016 DEP TENORM study, is prolific enough to damage those aquifers and force people to be drinking water that has radioactive material in it, which is cancer-causing, and it'll be a serious health concern for that aquifer and for those people for 1,600 years.

That's a major risk for something that you do not have conclusive data on with respect to discharging into an aquifer and knowing whether or not it's going to leak into other people's aquifers or discharging into (inaudible) oil and gas well.

So, that is part of the initial concerns that jumped right out at you. I mean you don't have a system in place in Pennsylvania. We are effectively disposing and safely disposing of this waste in injection wells. This is a trial system, this is an experimental system, which you'll be doing.

You'll be doing it under high pressure, you have no – as far as I know, no – you're saying that there's not going to be impacts to this drinking water area, however, you haven't done any kind of, as far as I know, 360 monitoring of this well or any kind of pressure testing of this well, which would be a good – enough data for you to make these kinds of conclusions.

And if you have that data, that kind of stuff needs to be presented to these people so they can make comments in regards to that. They can't just go off of your word that these injection wells are going to be safe because you authorize them in a place like Oklahoma or Texas. That's completely different than a place like Pennsylvania where you only have 13 that exist in the whole state.

This is also the headwaters and the drinking water for some of the cleanest water in the state and it has the highest amount of exceptional value streams in Pennsylvania, meaning these are the most pristine classified streams in the state.

And why would you then risk bringing in all of these tons of radioactive liquid wastes into a place like that to not only potentially spill above ground onto the surface of these areas through truck crashes or other things like that, which would absolutely wipe out these streams because they're not as wide and as large as the Allegheny River downstream? They're much smaller and much more sensitive. But also, why would you then put it underground and then just put – basically endanger these people's drinking water supplies in perpetuity?

You have a problem with your state regulatory agency who you're depending upon to do the oversight of these wells. They're currently being criminally investigated by the Attorney General's Office for misconduct of that agency to perform their duties.

There are multiple reports out about DEP's failure in their duties in the state. And the most concerning ones are about drinking water. It is about the DEP handling impacts to drinking water supplies from the oil and gas industry where they've misapplied the law, they've lied about the law, and it puts families' livelihoods in jeopardy and their health in jeopardy.

So, moving forward, you should not be able to essentially issue a permit that brings in this kind of dangerous material into the State of Pennsylvania until you have a Department of Environmental Protection who's capable of overseeing and protecting those drinking water supplies.

And the DEP's history right now is that they're not capable of doing that. They rely on natural attenuation in these situations, meaning that they just wait until they think hopefully in the future the pollution gets out of these drinking water supplies.

You have a case right next to this with North Hollow with JKLM Energy where a spill happened over there, which wasn't even a major spill, but those

contaminants that happened from that spill, which was 750 feet down right around the areas that you, guys, are dealing with, spread four to five miles in less than a couple days in these aquifers. These are extremely volatile areas that can spread fluids quickly.

Clearly, what's happening underground, the hydrological situation is that they communicate in a way that's not the same as other places. So, when a pollution event occurs, you can expect it to reach a vast area and you can expect that there's no way to clean it up and that you're going to have a state agency who relies on natural attenuation, and the natural decay of radioactive material inside of the fluids that you want to put down there is 1,600 years, and those fluids could – which we're talking about, what's considered safe under federal drinking water standards that the EPA brought up, that's 5 picocuries per liter. These fluids can range anywhere from 100 picocuries per liter to 26,000 picocuries per liter.

So, you're dealing with 10, 20 times as much to 1,000 times as much over the MCL that's safe for everybody.

So, there's a long list of really serious concerns and questions that the community should be able to have answered, which they can't have answered in a situation like this because you're dealing with Potter County, which is a rural area.

Many of them don't even have cell phone service in this place that you're wanting to put this well so they might not even be able to call in right now. And they also don't have good Internet. So, they can't be here to communicate with the EPA about this permit. They also have a ban on injection wells. That needs to be considered. You're talking about not going against local and state laws.

Clara Township, according to their county supervisors, has a ban that's passed on injection wells. So, that's something that you have to consider moving forward. And their township supervisor is unanimously against it.

So, our question, I guess, as journalists becomes, what is it that the EPA would need to receive or would have to have from either a township, a state

agency or experts in order to revoke a permit like this, in order to disprove a permit like this?

Is it – is there anything that you would have, that you could receive which would stop a permit like this because as far as we understand, as long as the company dot the I's and cross the T's, regardless of their history, you're going to approve this permit? And it's going to be up to the community to take their local laws and stop it from happening and there's nothing that they can do to stop it from happening with respect to communicating with EPA.

So, that kind of question would be good to get answered. And I appreciate you offering the time for us to provide comment on this and even though we feel very strongly about the data that exists against these injection wells, which can provide some conclusive answers for us.

We're also are going to be writing about this so people will be in touch with you to ask questions and try and get more information in regards to what's happening here in Potter County. Thank you.

Oh, I'm sorry, before I go, seismic activity, of course, that's another issue that has to deal – that needs to be dealt with, with these wells. Is the EPA requiring seismic monitoring in their permit? If they're not, that would be something that would have to be addressed.

You can't have this kind of stuff happening where there's a long incidence of – or a long history in the last decade of seismic activity coming from these wells from these fluids that that needs to be absolutely monitored. Thanks for your time.

James Bennett: Thank you for your questions and your comments. (Sarah), if there's another caller waiting, you can feel free to open the line.

Operator: Again, if you'd like to ask a question or to give testimonies, you will need to press "star" "1" on your telephone keypad. Participant who keyed in for your testimonies, please state your first and last name and your line is open. [redacted], your line is open.

[redacted] Yes. My name is [redacted] I live in Clara Township. The proposed injection well is on the mountain across the street from where we reside. On that mountain is a spring that we use, many people in the community use it.

Our families lived in this house for over 100 years, and the reason they lived here and has survived is because of that spring across the street. And there is absolutely no way that the EPA, the DEP, anyone can guarantee that there's not going to be (leech) that gets into our spring water.

I'd like to know how many in – approved injection wells, EPA improved injection wells have leaked. There's been a problem with it. Their job is to protect our water. We're doing everything we can to protect our water and I don't think you can tell me that there have – there hasn't been major significant detrimental problems. So, that's my question.

And the fact that it can happen, that it can – it should just be a no brainer. This should not be allowed to happen in Clara Township. It should not be allowed to happen in Potter County. We're in the headwaters. These waters, people – thousands and millions of people depend on this water. And if you were on up here, everybody below us is – the water is ruin.

So I appreciate you allowing our comment, and look forward to a good outcome about this. Thank you. Goodbye.

Operator: [redacted] your line is open.

Again, [redacted] your line is open.

Female: OK, go ahead. Go ahead and talk.

[redacted] Good afternoon. [redacted] speaking from Potter County, Hebron Township. And I have lived at the same location presently for 83 years.

I'm at the head of one of the major branches of fishing creek, and was on the committee back a few years ago when they were going to start getting all kinds of waste injected in shallow wells in Hebron Township and the surrounding townships. And we had to even hire an attorney to fight EPA.

And it just happened that there was a gentleman that had purchased a camp on Fishing Creek Road, and he heard about our problem, and attended our meeting. And he was from Centre County. And he said he had done extreme investigation of where the source of water for Centre County came from. Believe it or not, it came from Fishing Creek near where we live.

And that source of water flows off of our farm into the next five or six farms, and then goes underground as soon as the spring water flow drops. Then the creeks are bare. And this gentleman actually checked through the Soil Conservation and different agencies, and that is where their main source of water in Centre County came from Potter County.

I worked very hard with that committee to set up this whole program known as the Potter County Concerned Citizens. I am very much against what is trying to be done. And we had to hire another attorney to fight EPA, which we really should never have had to do.

But after this gentleman came from his place of business in Centre County to attend our meetings, it was just a matter of a few weeks this whole project was cancelled.

And I just do not feel we – even though science and – has all kinds of background and so on, we still don't know for sure where that water all goes and what aquifers that that water has to flow through to get to Centre County. And we, as citizens of Potter County, do not want to jeopardize our friends in Centre County.

I thank you for your time and the opportunity to speak. Thank you.

James Bennett: Thank you. (Sarah), you can open the line to the next caller.

Operator: Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

Participant who'd queued in for question, your line is open. Please state your first and last name.

[redacted]

James Bennett: Thank you, [redacted] Feel free to give your testimony.

[redacted] Yes, thank you for the opportunity. I just wanted to make a brief comment. The EPA is dependent upon the (inaudible), Department of Environmental Protection on certifying and verifying operations in any area where EPA permitting is required, I suppose. But (assuming) DEP has a very long record of doing things poorly.

And this is just going to be very brief. It is my position that the Pennsylvania Department of Environmental Protection has morphed into Pennsylvania Department of Oil and Gas Protection, and they have forsaken Pennsylvania Constitution Article 1, Section 27 authorities.

I have now taken to referring to the Pennsylvania DEP as the Pennsylvania Department of Oil and Gas Protection, or in short, the Pennsylvania DOGP, or DOG-P for short. Don't trust them. Thank you. I am done.

James Bennett: Thank you for your comment. (Sarah), feel free to open the line to the next caller.

Operator: Participants who have queued in for question, your line is open. Please state your first and last name.

[redacted] [redacted] I've lived in (Homer Township) since 1965. We've had property there. And I have several things that are bothering me about this.

First off, like everybody else, it's water. Also, the soil. (We have garden). I don't want anything into the soil. The roads; our roads aren't going to take them any trucks. The noise. That, and – there was one other one, now I can't think about it. I'm only 81 years old.

But there's – I can't see any good coming out of this. Thank you for listening to me.

James Bennett: Thank you. (Sarah), feel free to open the line to the next caller.

Operator: Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

There are no further questions at this time, sir, you may continue.

You have a question from [redacted] Your line is open.

[redacted] OK, thank you, ma'am. What I was wondering is for this type of a permit, if it is approved, does Roulette Oil and Gas, do we have to be bonded? And if they do have to be bonded, how much would the posted bond be for a permit like this? Thank you.

James Bennett: Thank you for your question. (Sarah), please feel free to open the lines.

Operator: [redacted], your line is open.

[redacted] Yes, this is [redacted] I spoke previously. But I forgot to mention, up there where that injection well is proposed, well number 20. There are numerous other wells, and I'm very concerned about communication between this injection well and all of the other surrounding wells. So I wanted to state that.

But I would like to know what is proposed – how are you going to protect that (leeching) from going in to those other wells, well on the water and everything else?

Once that pollution is shoved down in the ground, nobody can guarantee what's going to happen with that. You can put cement, you can use your steel. It is proven time and time again that it doesn't last, it cracked, it rust, there's holes, it will not last. So it's a bad idea. Thank you.

James Bennett: Thank you for your additional concerns. (Sarah), feel free to open the line to the next one.

Go ahead.

Operator: Participant who had queued in for your testimonies, your lines is open. Please state your first and last name.

[redacted] [redacted] again. I thought of what it was. What I wanted to say is what about – what does stuff like these do to property values, having something like that in your backyard?

James Bennett: Thank you for your concern and questions. We will be answering all comments and questions in a written format at following – sometime following this public hearing. We're just taking testimonies and questions at this time.

If you have anything additional, please feel free to add.

[redacted] All right, thank you.

Operator: Again everyone, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

[redacted] your line is open.

[redacted] Thank you. One thing came to mind on this again, they're willing to come in and inject the chemicals and waste and everything that goes along with it that could be very toxic to our drinking waters. But yet, no one has come in in protecting of the township, the county, the residents. Has anyone done clean water studies at this point before they start injecting? Have they taken water from our streams to see how pure they actually are? A lot of people are on springs, probably the cleanest water you'll ever drink.

Has there been any studies on the wells and the water sources that we have available to us at this time from the DEP or the EPA?

That's just an added question. Thank you.

James Bennett: Thank you for your additional concerns.

(Sarah), feel free to open the next one.

Operator: Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

Participant who had queued in for question or for your testimonies, please state your first and last name. Your line is open.

Participant who had queued in for question or for your testimonies, please state your first and last name. Your line is open.

James Bennett: If you press "star" "1", your line is now open.

[redacted] Oh, are you speaking to me?

James Bennett: Yes, it's you. Can you state your first and last name?

[redacted] This is [redacted] I wanted to say that I am concerned because in that area of Potter County, the water leaking as somebody was saying before, that water runs just about everywhere. You're close to the Triple Divide where you have water going to three major river systems, watersheds, and contaminate it would be catastrophic. Thank you.

James Bennett: Thank you.

(Sarah), you can open the next caller.

Operator: Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

[redacted] your line is open.

[redacted] Thank you. My name is [redacted]. I am a resident of Clara Township and Supervisor. I do have serious concerns over the oversight at the proposed injection well.

Based on historical data from the DEP's database, Roulette Oil and Gas has a long history of violations and discrepancies. Based – per that DEP database, they own and manage eight injection wells in both Clara and Hebron Townships.

I don't know if you need the ABI number. I'm sure you could go off the well name itself. I'm going to go ahead and name them.

It's Matteson 1, Matteson 2, Matteson 8, Matteson 16, Matteson 103, Matteson 116, Matteson 117, and Matteson 120.

When you look at the database, these wells have been classified as producing, abandoned, plugged, and also injection.

Matteson 1 has been inspected three times over the past 27 years. Somehow mysteriously, last year on 4/20, right as this application for a permit was applied for, Matteson 1 was all of a sudden went from an abandoned to an active well when it's – injection well.

The lack of oversight from DEP that it's actually – it brings – the question that brings to mind how much – how committed are they in protecting our environment and our water.

I'm asking the EPA to do an actual onsite inspection of these eight so-called injection wells prior to making a decision. If you really want to see what's on the ground here, if you really stand behind what you say you stand behind, you would actually do an onsite, in-person inspection of these eight wells prior to making a decision on this well here. Thank you for your time.

Operator: Next, [redacted], your line is open.

[redacted] Hi, I'm [redacted]. And I have the same – I'm hearing everybody has the same type of questions here. One question is solvency of the company, their past practices, how many citations they've had in the past. I mean, how qualified are they to do what they say, how will the wells be monitored? Will we have radiation testing, seismography? Will they test our water before and after? Do they have enough money, are they bonded? Can they take care of us when catastrophe strikes? And it sure, we will.

Who's going to be putting this (brine) into the injection well? Is it just this company, or are they going to open it up to other companies? Will there be a limit on how much they can put down there? I know there's pressure

monitoring, but I mean, how much fluid? Are they just going to fill in until it won't take any more?

Just to let you know we're concerned. That's all. Thank you.

James Bennett: Thank you.

Operator: [redacted] your line is open.

[redacted] Hello. I'm new to this discussion. I've been listening and certainly agree with all the concerns that have been stated. I think just some things that I would like to emphasize is the necessity for baseline testing, or the water in the community for all those residents who are possibly impacted by any spills that might occur as a result of this activity.

I also am concerned about abandoned oil wells, oil and gas wells that might also impact the water supplies. And the traffic going to and from the wells, if they are permitted, they're going to be crossing the Allegheny River to get to Roulette, and the possibility of spills is real.

And so – and I also think that the issue of people's ability to communicate with EPA during this time before March 4th, many people in the community do not have the means as [redacted] mentioned. And that's a very real concern.

So I hope that you will take all of these concerns, the residents of Clara Township quite seriously, and weigh them with the responsibilities for your agency, and make the right decision. That's all.

James Bennett: Thank you.

Operator: Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

[redacted], your line is open.

[redacted] (Inaudible), I'm a resident of Clara Township. I'm just going to read you the definition of the Environmental Protection Agency. The EPA was established

in December of 1970 by the Executive Order of President Richard Nixon, is an agency of the United States Federal Government whose mission is to protect human and environmental health. Headquarters in Washington, DC. The EPA is responsible for creating standards and for promoting the health of individuals and the environment.

And I stress it is responsible for promoting the health of individuals of the environment, not politicizing their mandate. Thank you.

James Bennett: Thank you. (Sarah), feel free to open the line to the next caller.

Operator: Yes, sir. Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

Participant who had queued in for your testimonies, your lines is open. Please state your first and last name.

[redacted] My question is will the township have to give a permit for this to happen? Or what – how do townships stand on either letting that go ahead, or stopping it? Thank you.

James Bennett: Thank you for your question. (Sarah), you can open the line for the next caller.

Operator: Again everyone, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

[redacted] your line is open.

[redacted] Thank you. I would just like to bring a light – bring to light again, being in a rural community with poor internet service, no real local newspaper – our closest newspaper is about 30 miles away – although we did have a good response tonight being short changed with the notice and trying to go around to gather people and tell people the information of what is being proposed for this permit has been difficult, especially in a time with COVID.

Now, I know we have a short extension of 30 days. And I would just like to ask if we could extend that a little bit longer. Even your driver's license, if it

ran out during the COVID period, you have an automatic extension of 90 days. And as a township supervisor, I would like to request a 90-day extension on this due to COVID-19, as well as living in a poorly communicated area due to poor technology, lack of newspapers, and just the overall situation that we're dealing with.

We need more time as a community to gather our people, to gather our thoughts, to go along with this – what you're trying to propose, so we can be onboard with it – or we're not onboard with it, I've used the wrong term there for sure, I'm sorry. I'd like to strike that from my comment. So we can all gather and go against and discuss what your proposal is for this injection well.

Again, I'd like to formally request a 90-day extension. Thank you.

Operator: Again, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

[redacted] please state your first and last name. Your line is open.

[redacted] [redacted], Supervisor for Clara Township. I have sat and I listened to a number of these calls. And I'm also concerned that we have numerous camps in our area that we have not been able to get the word out to yet, to let them know about this injection well. And I agree with [redacted] Supervisor, that we do need more time so we can contact the rest of the people in our community that also have springs – most of them are springs – and let them know what is going on in our community. Thank you.

Operator: Again everyone, if you would like to ask a question or to give your testimonies, you will need to press "star" "1" on your telephone keypad.

And excuse me, sir, there are no further questions or further comments at this time.

James Bennett: OK, thank you. If there's no more comments, I'd like to do a closing statement.

On behalf of the Environmental Protection Agency, I would like to thank you all for your participation here and your well-thought out comments on this permit proposal on Potter County. I assure you that all these comments will be given serious attention as we prepare a final decision in this permit request.

As I mentioned earlier, we've extended the public comment period an additional week – an additional month until March 4th, 2020.

I will – we will be responding to all the other requests including the formal request for a 90-day extension in writing following this hearing.

As a reminder, if you would like to submit copies of your testimony in writing, copies may be made and sent in no later than March 4th, 2020 in care of Kevin Rowsey, U.S. EPA Region 3, 1650 Arch Street, Philadelphia, Pennsylvania 19103, mail code 3WD22. Or email it to Rowsey.Kevin@EPA.gov. That's R-O-W-S-E-Y.K-E-V-I-N@EPA.gov.

For those of you providing oral testimony today, please send your email or mailing address to Kevin Rowsey so we can share the written response to comments with you directly. You can share your contact information by emailing Kevin once again at R-O-W-S-E-Y.K-E-V-I-N@EPA.gov, or calling 215-814-5463.

Once again, I thank you all for your comments and concerns. And thank you. This closes the formal portion of the hearing.

(Sarah), you can transfer me back to the speaker room.

Operator: Sir, thank you. Ladies and gentlemen, this concludes today's conference call. Thank you for participating. You may now disconnect.

END