UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

SUBJECT: Issuance of Final Underground Injection Control Permit

FROM: Kevin Rowsey
Source Water & UIC Section (3WD22)

TO: Cathy Libertz, Director
Water Division (3WD00)

Your signature is requested on the attached final permit and cover letter to the Seneca Nation ("the Nation").

On January 31, 2020, the draft permit for the Roulette Oil & Gas Company, LLC, ("Roulette") class II-D disposal injection well located in the Clara Field in Clara Township, Potter County, PA was published for public comment. After several requests for an extension, EPA extended the Public Comment Period until April 3, 2021. EPA held a virtual Public Hearing on February 2, 2021. EPA received 58 comments on the draft permit. EPA's Response to Comments is included in the concurrence package for your review. No changes were made to the draft permit. When the final permit is issued to Roulette, it will remain in effect for ten years. A permit is required to meet the provisions of the EPA-administered UIC Program in Pennsylvania.

EPA entered into formal consultation with the Seneca Nation regarding the Roulette draft permit on February 18, 2021 after a letter from Acting Regional Administrator Diana Esher was sent to the Seneca Nation offering consultation. The Nation submitted comments to EPA on March 8, 2021. EPA responded to the Nation's comments in a letter dated August 29, 2021. In accordance with EPA's Policy on Consultation and Coordination with Indian Tribes, Region 3 will effectively end consultation with the Nation once a final permit decision has been made. A letter notifying the Nation of EPA's decision to issue the permit and ending consultation is attached for your review and signature. Brian Hamilton of OCTEA has reviewed the letter. will be public noticed for 30 days with opportunity to request a hearing.

The signed final permit and Response to Comments will posted to EPA's website when the final permit is signed.

PERMIT:

ROULETTE OIL & GAS COMPANY, LLC
1140 ROUTE 44 SOUTH
SHINGLEHOUSE, PA 16748

PAS2D050BPOT