September 11 2012
Via Electronic Mail to oilandgas@dnr.state.oh.us and by U.S. Mail

Director James Zehringer
Ohio Department of Natural Resources
Division of Oil and Gas Resources Management
2045 Morse Road, Building H-3
Columbus Ohio 43229-6693

Re: Application # aAMY0000706 D.T. Atha Permit # 3761

Dear Director Zehringer,
I am writing under OAC 1501-9-3-06(E)(2)(a) and (c) with comments and concerns in reference to the above permit application. I request a public hearing in Athens to address the serious problems with this dangerous proposed industrial installation in our county.

Because this is an abandoned gas well being converted to an SWIW that means there is old casing and cement, which apparently is not removed but added to for the new injection well. Because there are new rules regarding cement quality how can the integrity of the old gas well meet new standards? Chuck Lowe from the EPA told me that the key for the integrity and safety of an injection well is that the cement bonds all at the same time in a uniform manner. This information was then confirmed by an ODNR former inspector Dan Goins. Special cement additives and centralizers are required for this result. That was not done in 2007 as the submitted cement records show. There appear to be no elastomers or other required additives used to insure uniform bonding. It seems a little late to determine the integrity of the well after a permit is issued and high-pressure injection of hazardous materials are leaked from the well.

Even though ODNR has regulatory control in the state of Ohio regarding the UIC program for Class II wells, the EPA are asked to comment on each application. OEPA submitted comments regarding the cement used and casing and tubing construction depths. Since OEPA is charged with the USDW program and they reference that as a concern it seems that ODNR would respond to their concerns. To me, a citizen in Athens County I feel that is a very important health and safety concern.

Although the EPA notes that there are no public water systems within 2000 feet of the proposed SWIW, there is no reference as to the aquifer there and relationship to surface water contamination. ODNR is charged with that safety and health issue.

Another health issue is that of mitigation. I see no mitigation plan in the application that will address a spill, blow out or any disaster that could cause contamination to ground water. There is a simple schematic of 7 tanks and mention of a lined pit that is supposed to take care of that kind of a situation. There is mention of brine meters. There is also only one employee on site. I saw no times of day for accepting waste, nor how often the waste is pumped into the injection well itself. If the tanks are within the dike area which then is in the “basin” is there not a displacement calculation missing? There would not be an area of 1.5 times the holding tanks. The sump pump listed in the application that will handle an over flow, pumps the waste to where? How is a storm such as the one on June 29 2012 handled?

There are no core samples or reports for reservoir porosity and permeability. Is there data available to determine the structural setting of this reservoir? Do we the public simple rely on the fact that a geologist has reviewed this and believes that the Ohio Shale and Oriskany formations are acceptable?

I note that under Well Construction and Operations the applicant states that he will test the casing according to" ODMRM" specifications. ODNR Oil and Gas Division has new rules and Mr. Atha refers to old rules. That does not make me feel safe! I want to know that the operator KNOWS the specifications and puts them in the application. Also under Injection Pressure; is it 550 psi or 630 psi and why? There is no documentation as to the cause for the increase.

In addition, there is no reference to the annulus for mechanical integrity testing. **How can a leak be detected? Moreover, how can the initial pressure test be accomplished without it?**

Another safety issue is that this area has no cellphone service. How can a citizen call in a problem if there is one? What if there is an accident? What about first responders? How would they communicate? Moreover how the hell would they know what is in a tank truck? There is only on the manifest where the waste is coming from NOT what is in it. Those trucks simply have to display a placard with BRINE on it. Brine as defined by the Ohio Revised Code can include an enormous amount of harmful and life threatening substances, such as benzene, toluene, petroleum distillates, formaldehyde, and more, all of which the public has a right to know. Responders should know what is in those tanks before heading out to try to control a problem.

Although ODNR does not have this concern as it is related to highways but you will be approving a permit that the location is on a major school bus route for the Federal Hocking Schools on State Route 144. All buses coming from and going to the eastern end of the County travel on this road. There are 24 busses a day travelling to and from the schools. There will be as many as 30 tank trucks a day entering and leaving the well site. The road is narrow, winding and hilly. The ingress and egress of this well site will pose a serious hazard for bus traffic.

The Geologic Review for Class II Wells for this application has no author, no reference to where the data was obtained or the date this information was written. A cut and paste perhaps? There is no credibility in a nameless report. Why do the new rules regarding geophysical logs not apply to this well?

There must be a public hearing in Athens County to address these and possibly other health safety and conservation issues on the Atha application that citizens more knowledgeable than myself may address to you. This should be mandatory not discretionary on your part. I am sure that you will understand the concerns we have and agree to our requests.

Sincerely,
Roxanne Groff
14222 Marietta Run Road
Amesville, Ohio 45711