

**No More Injection Wells:
Demand a Public Hearing on Atha Permit
Submit comments by 9/29**

for more information go to acfan.org/injection-wells/

NOTE: links do not seem to work on this pdf. Please copy and paste!

Citizens have until Sept. 29 to send in comments and concerns about a permit application for the Athens County Atha well on Rte. 144 near Frost, OH, to Ohio Department of Natural Resources Please write now to request a **PUBLIC HEARING IN ATHENS** on this dangerous industrial plan. Details below.

Please say to ODNR (personalize this sample language!):

"I have concerns about long term groundwater contamination and the potential for contamination of nearby surface water. I question casing integrity, inspection and regulatory oversight, and potential for hazardous waste to be injected into a Class II well. Simply because oil & gas recovery waste is exempt from being called hazardous waste does not make it non-hazardous for residents of the area. My concern is for the long term health and safety of my community as well as overall ecosystem health along the adjacent Hocking River Valley. Please schedule a public hearing in Athens promptly." *Please add support for your appeal from talking points below.*

The public can only comment ON THE PARTICULAR WELL and concerns *with this particular well* that have to do with 1. Health and safety and 2. Conservation. Talking points below (and sample letters at acfan.org) that address issues SPECIFIC to the ATHA well.

The public can also ask for a **PUBLIC HEARING** to be held where these issues can be raised in a public forum. *Issues raised must be considered by the ODNR Chief of Oil and Gas before the division grants the permit.*

- Send your e-mail letter to oilandgas@dnr.state.oh.us
- cc James.Zehringer@dnr.state.oh.us and Rick.Simmers@dnr.state.oh.us
- **Address letters** to James Zehringer, Director, ODNR, and Richard Simmers, Chief, DOGRM.
- **E-mail must be received before midnight, Sept. 29.**
- **Include reference to Permit # 3761** and application # aAMY0000706.
- **DEMAND A PUBLIC HEARING IN ATHENS!**
- **Carbon copy your elected officials:**
 - State Representative Debbie Phillips: district92@ohr.state.oh.us
 - State Senator Lou Gentile: Steven.Blalock@ohiosenate.gov
 - Governor John Kasich: www.governor.ohio.gov/Contact/ContacttheGovernor.aspx
 - Senator Sherrod Brown: Jeanne.Wilson@brown.senate.gov

Senator Bob Portman: portman.senate.gov/public/index.cfm/contact-form

Athens County Commissioners:

Lenny Elison: leliason@athenscountygovernment.com

Larry Payne: lpayne@athenscountygovernment.com

Mark Sullivan: msullivan@athenscountygovernment.com

Visit acfan.org/injection-wells/ to see permit application and sample letters.

Permit app also at [SORE Facebook page](#).

Background:

Injection wells take the so-called “brine,” “produced water,” and “fracking fluid” — the liquid waste from oil and gas wells. It is laced with toxins, both intentionally included in fracking fluids, and unintentional, from the deep earth. It has been found to be highly radioactive. Tanker trucks haul this to an injection well and, under pressure, dump it into the well. It supposedly goes into the porous rock formation at the end of the pipe, about 3000 to 4000 feet down. **Ohio law does not require aquifer mapping before permitting or monitoring of groundwater or surface water in area for contamination ever.**

There are 4 wells in Athens County. 2 are in Rome Township. The others are in Lee and Alexander Townships. There are pending permits for 2 more wells - in Rome and Troy Townships. Each well has a yearly limit of how much wastewater it can legally take.

Nearby states - West Virginia, New York, and Pennsylvania don't allow injection wells, so their states' liquid frack waste is brought to Ohio and dumped in our wells. As fracking grows, the number of injection wells in Ohio is bound to increase.

Truckers are not required to tell the well owner what is in the waste- they only have to disclose how many gallons they are dumping.

Issues: The ATHA Well:

- An abandoned gas well is being converted to a brine injection well:
- There is no description of how an annulus will be created. (The annulus is the sealed shaft of fluid that enables testing for mechanical integrity. An annulus enables inspectors to determine breeches of pipes and cement: When pressure in the annulus is low or nonexistent, as repeatedly in the Ginsburg well, inspectors know there is a leak somewhere. The fluid could be going anywhere.)
- There is old cement and piping in the existing bore hole. Why is it not removed?
- How is the uniformity of the cement outside the casing tested?
- There are no reports back to OEPA regarding questions about the cement and the depth of the casing and tubing not agreeing with schematic diagram.
- There is no map of the aquifer.
- There is no reference as to the author of the Geologic Review.
- There are no core samples or reports of the Oriskany Formation and its porosity and permeability.
- St Rt 144 is a bus route for twenty-four bus runs a day. More than a dozen—or even dozens--of “brine” (toxic waste) trucks will have to use this route.
- No information as to what is in the “brine.” There will be no restrictions on where the waste comes from. If waste coming from a fracking site is transported to this well we KNOW there are hazardous materials in this waste. Waste currently shipped into OH from PA is documented to have radioactivity over 3000x safe drinking water levels.
- Conventional well “brine” is toxic enough. Fracking waste has additional petroleum distillates, radium, strontium, formaldehyde, toluene, benzene, among many toxic and cancer-causing chemicals.

– SEE acfan.org/injection-wells/ for [sample letter](#). Feel free to copy and paste!

Injection Wells In General:

- **Many of the chemicals used in fracking are hazardous to health.** They would not be allowed if the industry were regulated by the Safe Drinking Water Act, which regulates

other underground chemical injections. The oil and gas industry is also exempt from the Clean Air and Water Acts and Resource Conservation and Recovery Act (federal hazardous waste regulation). Large quantities of chemicals are used in each well—up to 900,000 pounds, contrary to industry hype about low percentages (1% of 10 million gallons of water is a lot of chemicals).

- **Companies don't have to tell what they are injecting.** If there is an accident, health professionals can access information but must keep it confidential. They can't even tell the patient.
- **Wells leak.** A ProPublica review of well records, case histories and government summaries of more than 220,000 well inspections found that structural failures inside injection wells are routine. From late 2007 to late 2010, one well-integrity violation was issued for every six deep injection wells examined.
www.propublica.org/article/injection-wells-the-poison-beneath-us
Also see acfan.org [water](#) and [injection well docs](#), both in Research and Reports.
- **Chemicals move underground much faster than previously thought.** Tom Myers, a hydrologist whose work was recently published in the National Groundwater Association journal, drawing on research showing that natural faults and fractures are more prevalent than commonly understood, created a model that predicts how chemicals might move in the Marcellus Shale. Myers' new model shows that chemicals could leak through natural and manmade cracks into aquifers tapped for drinking water in less than TEN years, far more quickly by magnitudes than previously thought.
- **Mechanical Integrity tests are only required to be done every 5 years** on Class II Injection Wells. If a leak is discovered it may have been leaking for some time. The Ginsburg well documents show it went uninspected for ten years. Inspections there repeatedly found failure of integrity tests. No changes were made to the well, which continued to receive waste. The Ginsburg well has been receiving high volumes of out-of-state fracking waste for at least the last two years.
- **Of the 12.2 million barrels of “brine” injected into Ohio disposal wells last year, 53 percent came from Pennsylvania and West Virginia.** *Radium in one sample of Marcellus shale wastewater, also called brine, that Pennsylvania officials collected in 2009 was 3,609 times more radioactive than a federal safety limit for drinking water. It was 300 times higher than a Nuclear Regulatory Commission limit for industrial discharges to water.* (Columbus Dispatch, 9/3/12, linked at acfan.org)
- Although ODNR claims the Atha well will only take waste from shallow wells, *there is no regulation that limits where the waste comes from.* It is licensed as a Class II well. Any deep-well waste, local or not, will be highly radioactive and highly toxic.
- **ODNR does not test area water or ground for contamination around its wells. Groundwater and surface water monitoring are NOT REQUIRED.**

Please write. Numbers count! We need them to listen to us.

Visit acfan.org and appalachiaresist.wordpress.com for more.

Thanks to Teresa Mills, **Buckeye Forest Council** Coordinator for her technical support and ODNR document research.

**Athens County Fracking Action Network, acfan.org
acfanohio@gmail.com**