

December 19, 2014  
re: UIC Permit Application aPATT026224

To: [oilandgas@dnr.state.oh.us](mailto:oilandgas@dnr.state.oh.us)

CC: Ms. Susan Hedman, Regional Administrator, USEPA Region 5 [hedman.susan@epa.gov](mailto:hedman.susan@epa.gov),  
State Senator Lou Gentile [Steven.Blalock@ohiosenate.gov](mailto:Steven.Blalock@ohiosenate.gov),  
State Rep. Debbie Phillips [Rep94@ohiohouse.gov](mailto:Rep94@ohiohouse.gov),  
Athens County Commissioner Lenny Eliason [leliason@athensoh.org](mailto:leliason@athensoh.org)

Dear Chief Simmers:

I write in strong opposition to the proposed Athens County injection well K&H #3, which is likely to cause long-term harm to our community's air, water, public health, and property values.

Knowing the public opposition from previous injection wells owned by the same applicant, Mr. Harper and ODNR may have timed the public notice of this injection well permit to purposefully avoid public scrutiny. In doing so, they further erode the public's trust in the State's stewardship.

I list here just a few of the many concerns that I share with many in our community who are not able to respond during this public comment period, based on its unfortunate timing at a time of year when families may be traveling or celebrating holidays.

1. This is a highly deficient application that will not prevent pollution of land, surface water, and drinking water sources as required by Ohio law (OAC 1501:9-3-04). There is no geologic data presented to protect water supplies---drinking water, groundwater, and underground water sources---or public health, safety and environmental conservation.
2. Geologic data from K&H #2 indicates that the geologic zone where wastes would be injected for disposal will not adequately confine the wastes and thereby fail to prevent adverse effects on human health and/or contamination to ground water, protected by R.C. Chapter 1509 and the federal Safe Drinking Water Act.
3. The protective casing of the proposed K&H #3 is proposed to extend only to a depth of 2050 feet in the approximately 4,200 foot deep borehole, thereby insufficiently confining the waste, leading to the likelihood that this well may result in an adverse effect on human health and/or contamination to ground water, protected by R.C. Chapter 1509 and the federal Safe Drinking Water Act.
4. The volume of waste to be injected increases likelihood of water contamination.
5. Aquifers of the region are not mapped and so are not taken into account in the siting and plans for this well, in violation of Safe Drinking Water Act and USEPA standards.
6. K&H#1 injection disposal well at the same facility has shown in numerous incident reports that the well annulus cannot sustain substantial pressure and/or has operated at a vacuum, indicating that a well in that vicinity may likely result in adverse effects on human health and contamination to ground water, prohibited by R.C. Chapter 1509 and the federal Safe Drinking Water Act.

7. ODNR does no monitoring of drinking or ground water around its injection wells, including the current K&H wells, so neighbors will not know when contaminants find a pathway to groundwater from K&H 1, 2, or 3. There is no assurance that the K&H1 and K&H2 have not already contaminated local drinking water sources.
8. Studies of oil and gas waste emissions confirm that benzene and other known human carcinogens are present, often at extremely high and often illegal levels. ODNR does no air monitoring around its injection wells, so neighbors will not know what chemicals they are being subjected to in the air they breathe. The current facility with its 12 storage tanks vents toxic hydrocarbons and volatile organic compounds directly into residential neighborhoods almost constantly, leading to chronic if low dose exposure of chemical combinations.

I request a public hearing in Athens County based on my substantive concerns with the serious deficiencies of this permit application to prevent contamination and pollution of surface of the land, surface water and groundwater, as required by Ohio Administrative Code 1501:9-3-04, which states: (A) All persons engaged in any phase of saltwater disposal operations shall conduct such operations in a manner which [sic] will not contaminate or pollute the surface of the land, or water on the surface or in the subsurface..." My concerns, substantive and relevant to public health, safety, and environmental conservation, merit a public hearing because *Ohio law requires that the Chief grant a public hearing if ANY comments are substantive and relevant to health, safety, or good conservation practices.* (OAC 1501:9-3-06 (H)(2) (c)).

Sincerely,

**NAME:**

**ADDRESS:**