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McDonald, Jeffrey

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From: Gilmore, Tyler J [Tyler.Gilmore@pnnl.gov]  
Sent: Thursday, March 06, 2014 10:07 PM  
To: McDonald, Jeffrey; Bayer, MaryRose  
Cc: Bonneville, Alain  
Subject: AoR Determination

Jeff and Molly,  
We do not believe there is a technical basis for establishing the Area of Review (AoR) based on the maximum extent of the 10 psi pressure front, however, we do recognize EPA's determination today that this will be the basis for AoR in the draft permit. We are now focused on how we can reasonably meet this determination.

The AoR based on the 10psi pressure front represents an area of approximately 188 sq miles and presents a number of practical challenges. As you know the regulations require that we provide a map showing the injection well for which a permit is sought and the applicable area of review consistent with 146.84. Within the area of review, the **map must show number or name, and location of all injection wells, producing wells, abandoned wells, plugged wells or dry holes, deep stratigraphic boreholes, State- or EPA-approved subsurface cleanup sites, surface bodies of water, springs, mines (surface and subsurface), quarries, water wells, other pertinent surface features including structures intended for human occupancy, State, Tribal, and Territory boundaries, and roads. The map should also show faults, if known or suspected. Only information of public record is required to be included on this map.**

We request that we may provide this information either through maps or by reference. For example providing an exhaustive list of "structures intended for human occupancy" is not practical, especially when several towns and villages are included in the resulting AoR. We can however, provide this information by reference by identifying the county assessors offices. Please advise us whether this approach will meet the intent of the regulations.

Respectfully  
Tyler