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October 25, 2017

Janette Hansen  
U.S. EPA, Water Division  
UIC Branch (WU – 16J)  
77 W. Jackson Blvd.  
Chicago, IL 60604-3590  
hansen.janette@epa.gov

Re: Grove #13-11 proposed Class II Injection Well  
Permit Number MI-051-2D-0031

Dear Ms. Hansen:

We are writing to request a FORMAL PUBLIC HEARING regarding the Class II Injection Well Permit (Grove #13 – 11, permit number MI-051-2D-0031) that has been applied for by Jordan Development Company, LLC.

A reasonable outreach effort should be made to inform the public of this meeting and to include the public in the process. I recommend use of the Gladwin County Record and Beaverton Clarion, Clare County Review, and the Clare County Cleaver for this purpose. As there are several local papers for this area, it is very important that this meeting be announced in all of our local papers.

Public understanding and participation is paramount in a functional democracy, and this fact alone is reason enough that a public meeting be held.

Our family owns property in Hamilton Township, which borders Sage Township. Everyone living in Sage Township uses well water. Everyone living in Hamilton Township relies on well water. Every township in the area relies on ground water. Our family uses well water. We are extremely concerned. We value the safety of our drinking water and the natural beauty of the area in which we live. We take seriously our responsibility in doing all we can do to protect it. A public hearing to address our citizens questions and concerns is the least we can do.

We believe this project represents an imminent threat to public health and that it represents a significant risk for ground water contamination. There are a number of other concerns, as well. These additional concerns include, but are not limited to:

- \* Issues and concerns regarding well water contamination
- \* Contamination of area lakes, rivers, and other wetlands (features that Gladwin is widely known for)
- \* Possible changes in water pressure for residents depending on private wells

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- \* Ability of local first responders and emergency workers to respond to and address any possible emergencies or accidents that may occur
- \* Questions regarding exactly what this project might entail, as most of the residents here are unfamiliar with Injection Permits, Disposal Techniques, Safety Protocols, and various other issues relating to this industry
- \* Questions about a permit issued on 6/25/15 to drill for oil into the Dundee formation for Grove '13-11' well. Was there a bona fide effort to actually produce oil, or was this merely a device to secure H2S sour gas production and to send it by way of a flow line built strictly for H2S product?
- \* There is a flow line on the grounds. It is marked with warning signs and an emergency phone number in the MISS Dig color of yellow. When was it built and what mapping records exist for this line in compliance w/ administrative law and rules of the Michigan Public Service Commission? H2S is highly corrosive, and the aforementioned flow line immediately crosses the watershed of the Little Sugar River after leaving the well pad site. What will be the safeguards for the pressure leaks with the advent of the proposed 973 psi injection pressure at the wellhead?
- \* There is a central production facility (CPF) located about 3/4 mile away from the well site. It is situated on the west side of Oberlin Road (east line of section 14, Sage Township). Due to the linkage of risks to the proposed injection site, why is this area not included as part of the Area of Influence?
- \* Naming convention for Grove '13-11' suggests 12 other wells within the significant drilling unit(s) of Section 11. What are the records for these wells and what risks do they pose? Perhaps a number of these wells were spudded with no field geologist recording the data at the time of drilling. How many of these actually punched the aquifer (noted as going to a depth of 729 feet in this locale)? This needs verification and / or research by the EPA to mitigate the risk.

We believe a FORMAL PUBLIC HEARING would be an ideal forum to address these concerns, as well as any additional concerns from members of the community.

Please grant us a FORMAL PUBLIC HEARING.

Sincerely,




Emerson Joseph Addison III & Minh Thi Nguyen  
Concerned Citizens

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