BEFORE THE ENVIRONMENTAL APPEALS BOARD UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C.

In the Matter of:	<u> </u>
Penneco Environmental Solutions, LLC)
)
Borough of Plum, PA,)
Petitioner) Permit Appeal: UIC 18-02
UIC Permit No. PAS2D701BALL)
) ,)

REGION III'S STATEMENT REGARDING REGION 3 FRAMEWORK FOR EVALUATING SEISMIC POTENTIAL ASSOCIATED WITH UIC CLASS II PERMITS

The United States Environmental Protection Agency (EPA) Region III (Region), respectfully submits the below response to the Environmental Appeals Board (EAB) August 20, 2018 Order Regarding Attachment to Region 3 Response Brief. In response, the Region states as follows:

- 1. The Statement of Basis (SOB) that is Tab D to the Region's May 21, 2018
 Response to Petition for Review references the "Region 3 framework for evaluating seismic potential associated with UIC class II permits, updated September 2013."
- 2. Tab K to the Region's Response contains the "Region 3 framework for evaluating seismic potential associated with UIC class II permits" dated June 13, 2013.
 - 3. Attached to this submission is the "Region 3 framework for evaluating seismic

potential associated with UIC class II permits, updated September 2013."

- 4. The differences between the June 2013 and September 2013 "Region 3 framework for evaluating seismic potential associated with UIC class II permits" are minimal and do not alter the approach taken in the application of the "Region 3 framework for evaluating seismic potential associated with UIC class II permits." The key differences are outlined below.
- 5. Page 1, paragraph 1 of the June 2013 version cites to the prepublication draft of "Induced Seismicity Potential in Energy Technologies," National Academy Press, 2012. Page 1, paragraph 1 of the September 2013 version cites to the published version of "Induced Seismicity Potential in Energy Technologies," National Academy Press, 2013.
- 6. Page 3, the third full paragraph of the June 2013 version cites Halliburton
 Cementing Tables for industry standards concerning design of casings to withstand significant
 internal and external pressure. Page 3, the third full paragraph of the September 2013 version, in
 addition to the Halliburton Cementing Tables for industry standards concerning design of casings
 to withstand significant internal and external pressure citation, incudes a citation to the American
 Petroleum Institute (API).
- 7. Page 3, the forth full paragraph of the June 2013 version cites to the prepublication draft of "Induced Seismicity Potential in Energy Technologies," National Academy Press, 2012. Page 3, the forth full paragraph of the September 2013 version cites to the published version of "Induced Seismicity Potential in Energy Technologies," National Academy Press, 2013.
- 8. Finally, page 3, the forth full paragraph of the September 2013 version includes a citation to "A White Paper Summarizing a Special Session on Induced Seismicity, Ground Water Research & Education Foundation, February 2013," which was not cited in the June 2013

version.

9. The Region respectfully submits "Region 3 framework for evaluating seismic potential associated with UIC class II permits, updated September 2013," and apologizes for any confusion caused by the inclusion of the June 2013 version with the Region's Response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Statement on the date specified below, by electronic mail and U.S. Mail:

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I also certify that I filed the original electronically with the Environmental Appeals Board.

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