

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

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HEARING CLEEN

IN THE MATTER OF

Mr. Gene A. Wilson  
101 Madison Street  
P. O. Box 702  
Louisa, KY 41230

Docket No. SDWA-04-2005-1016

Respondent

\*\*\*\*\*

**MOTION**

Comes the Respondent and states as follows:

E.P.A.'s attorney, Ms. Zylpha Pryor, states in her Motion For Accelerated Decision On Liability at page 4 that "Respondent never took seriously his responsibilities as the owner/operator of a permitted mechanical integrity well".

This allegation now makes it imperative that two (2) injection wells KY10344 and KY10503 permitted by Respondent and operated until 1994 become a part of this record.

Further, pursuant to the Freedom of Information Act, Respondent requests he be permitted to inspect the complete files on these two (2) permits and perhaps the lost or misplaced files of this permit application may be found to establish Respondent continuously asked the permit in question be corrected to allow brine from other producers be injected on Collier Creek.

Wherefore Respondent prays that injection wells KY10344 and KY10503 become

a part of the record and pursuant to the Freedom Of Information Act he be permitted to inspect the contents of the files concerning these two (2) injection wells at E.P.A.'s office in Atlanta, Georgia.

Respectfully Submitted



Gene A. Wilson  
P.O. Box 702  
Louisa, KY 41230

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the date noted below, the Motion To Require Complainant To File First was mailed as follows: the original to the Regional Hearing Clerk and one (1) copy each to Hon. Susan B. Schub, Regional Judicial Officer, Hon. Zylpha Pryor and Mr. Nicholas N. Owens, National Ombudsman in the manner specified on the date below:

Ms. Patricia A. Bullock  
Regional Hearing Clerk  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8960

(Via Express Mail - Return Receipt Requested)

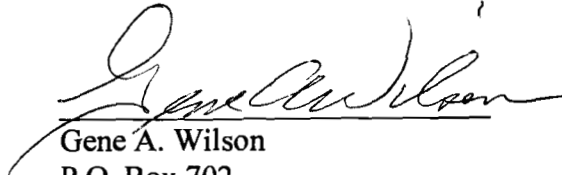
Hon. Susan B. Schub  
Regional Judicial Officer  
U.S. EPA, Region 4  
Atlanta Federal Center  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8960

(Via Express Mail - Return Receipt Requested)

Ms. Zylpha Pryor  
Associate Regional Counsel  
U.S. EPA, Region 4  
61 Forsyth Street, S.W.  
Atlanta, GA 30303-8960

Mr. Nicholas N. Owens  
National Ombudsman  
U.S. Small Business Administration  
409 3<sup>rd</sup> Street, SW  
MC 2120  
Washington, DC 20416-0005

Dated: 2/20/07

  
Gene A. Wilson  
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