

September 27, 2014

PageOne Plus Wholesale, Inc.
PO Box 691335
Tulsa, OK 74169

United States Environmental Protection Agency
Region 6
1455 Ross Avenue, Suite 1200
Dallas, TX 75202

FILED
2014 SEP 25 11:10:12
FBI - DALLAS

Re: Administrative Complaint, Proposed Consent and Final Order
Docket Number SDWA-06-2014-1106
Well #54

Attn: Compliance Assurance and Enforcement Division

Hello, I received an Administrative Complaint and proposed Consent Agreement and Final order concerning Well #54. The complaint states that I, based on review of your files maintained on the reference well, has violated the Safe Water Act for failure to plug Well #54.

On August 17, 2007 I took ownership of 2 Oil & Gas Mining Leases – S/2 SW/4 Section 15, T29N, 11E and SE/4 Section 16, T29N, 11E which has over 25 wells combined on the 2 leases. On March 5, 2008 I was granted the authority to consolidate both leases and produce the oil production into one common tank on Section 16, T29N, 11E. On Section 15 some of the wells are divided by a river and I am only producing at this time the wells on Section 15 and 16 that are on the same side of river to prevent any violations.

As far of the existence of Well #54 and many other wells on the other side of the river that I am not producing at this time, I did not received a letter from the EPA on February 28, 2008 of change in ownership of UIC Permit Numbers for Well #54 are anything showing that it was an Injection Well. On April 3, 2009 I wrote a letter to BIA accepting all well bores on the 2 leases and stated I did not want any of them plugged.

In your administrative complaint stated that I was required to plug the well within one year after termination of injection and that I ceased to use this well on or before April 1, 2009.

Well #54 has not been MIT since April 13, 1999, over 15 years. I go and I have never operated or put equipment in this well. This well was not located by the EPA or the Osage Energy Department until August 24, 2012 and in the comments of the inspection stated "T&A Well; No evidence of recent activity around well head; heavy vegetation grown up and no trail seen to well. Found it by using GPS Coordinates" and showed no signs of any violations of contamination of the safe water act with the very heavy vegetation grown up and around this well bore.

The Public has not responded to this complaint showing any violations and on March 3, 2014, I wrote a letter to the EPA and let the Osage Nation know that Well #54 will be a Oil producing well.

I do not consent to the proposed final order and feel that Well #54 was not in violation, its been untouched and not produced in over 15 years with heavy vegetation all around it and proposes no threat. Please rescind this final order and accept Well #54 as a oil producing well.

If you have any questions please contact me at 918-951-0000.

Sincerely,



Terrance Lewis, CEO
PageOne Plus Wholesale, Inc

FILED
MAY 13 2014
OSAGE COUNTY, OKLAHOMA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

FEB 28 2008

FILED
2014 NOV -5 AM 10:12
REGIONAL HEARING CLERK
EPA REGION VI

REPLY TO: 6WQ-NP

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7001 0360 0003 6669 3943)

Page One Plus Wholesale
P. O. Box 691335
Tulsa, OK 74169-1334

Re: UIC Permit Numbers: 06S1262P5694 (well no. D076), 06S1262P5715 (well no. C05)
Osage County, Oklahoma

Dear Sir:

Due to the change of ownership of the above wells and based on receipt of the necessary documentation, the permits listed above have been transferred to Page One Plus Wholesale. All terms and conditions of the permit remain in effect. A minor permit modification referencing the change of ownership is enclosed.

If you have any questions, please call the Osage UIC field office in Pawhuska at (918) 287-5333 or Diane Smith at (214) 665-2145.

Sincerely yours,

lf
Miguel I. Flores
Director

Water Quality Protection Division

Enclosure

cc: BIA, Minerals Branch
Osage UIC Office

PageOne Plus Wholesale, Inc.

10404 E. 55th Pl. Suite E

Tulsa, Oklahoma 74146

O - 918-951-0000

F - 918-632-0013

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2014 NOV -5 AM 10:12
REGIONAL HEARING CLERK
EPA REGION VI

April 3, 2009

To: Bureau of Indian Affairs
Richard Winlock

Re: Oil and Gas Mining Leases
S/2 SW/4 Section 15, T29 North, R11 East (G06-20651)
SE/4 Section 16, T29 North, R11 East (G06-20652)

Richard, this letter is in reference to our conversation today about the well bores on the two above leases. I accept all the well bores and do not want any of them plugged. If you have any questions or concerns, please give me a call.

Thank you,



T. Lewis, President/CEO

Well Inspection
Osage ENR Department
P.O. Box 1495
Pawhuska, Ok 74056

Inspector: Larry Stephens *lms* Dt/Tm Inspected: 8/24/2012 1:15:00 Duration: 0.5
Operator Representative: NONE Dt Scheduled: _____ Dt Op Notified _____

General Well Data and Inspection Information

Operator: Page One Plus Wholesale, Inc. Inventory No.: OS1699 API Well No. 35-113-10572-00-00
PO Box 691335 Well Name/No.: N. HICKORY CREEK D54 Status: CA
Tulsa OK 74169-1335 Location: SW 15 29N 11E 1320E - 440S Well Type: EOR
Phone: _____ Field Nm _____ Lat/Lng: 36.9864, -96.1058 G

ROUTINE UIC INSPECTION

Purpose: Routine Periodic Responsible Company at Time of Inspection: Page One Plus Wholesale, Inc.
Inspect No.: iLMS1224037148 Notification Type: _____
Incident No.: _____ Date Letter Sent to Owner: _____ Extension Date: _____
Comply No.: _____ Date Remedy Required: _____ Date Passed: _____

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COUNTY CLERK
OSAGE COUNTY, OKLA
EPA REGION VI

Pressures / Conditions

Date Last MIT: 4/13/1999 Test Result: A Casing: 7 in. Tubing: 2.375 in. USDW: 200 ft subsurf

Monitoring Device Elected: _____
Monitoring Device: _____
FLM Canister Pressure: _____
Lease Status: Active
Barrel Monitor Hooked Up?: _____
Barrel Fluid Level (%): _____
Flowline Hooked Up?: N
Injecting?: N

	Tubing	Annulus	
Fittings:	<u>Y</u>	<u>Y</u>	AUTHORIZED
Actual Pressure:	<u>0</u>	<u>0</u>	Max Pressure: <u>259</u>
How Determined?:	<u>OV</u>	<u>OV</u>	Min Req Press: _____
Static Fluid Level:	<u>256</u>	<u>20</u>	Max Rate: _____
How Determined?:	<u>E</u>	<u>E</u>	
Injection Rate (bpd):	_____	_____	How Rate Determined? _____

Comments

T&A WELL; NO EVIDENCE OF RECENT ACTIVITY
AROUND WELLHEAD; HEAVY VEGETATION GROWN
UP AND NO TRAIL SEEN TO WELL. FOUND IT BY
USING GPS CO-ORDINATES.

March 3, 2014

United State EPA
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

FILED
2014 NOV -5 AM 10:12
REGIONAL HEARING CLERK
EPA REGION VI

Re: Administrative Complaint
Docket No: SDWA-06-2014-1106
Inventory No: OS1699
Well No: 54

Attn: David Aguinaga

Hello gentlemen, I have spoken with Larry Stephens (UIC Field Inspector) with the Osage Nation Underground Injection Control Program concerning my injection wells that I have presently.

I am converting the following Well to a Producing Well:
Well No. 54 (SW/4, Sec. 15, T 29N, R 11E), Inventory No. OS1699

I have a scheduled inspection meeting with Mr. Stephens Friday, March 21, 2014 out at the lease to view and discuss about my other injection wells.

I ask that the administrative complaint be rescinded and my plan to convert Well No. 54 to a producing well has been accepted by the Osage Nation.

If you have any questions please give me a call at 918.951.0000 or Larry Stephens at 918.287.5333

Thank you for all of your help and assistance

Sincerely,



Terrance Lewis
PageOne Plus Wholesale
PO Box 691335
Tulsa, OK 74169