

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

RECEIVED
EPA REGION IV
2007 JUL 19 PM 3:56
HEARING CLERK

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 TO MAKE ADDITION TO RESPONDENT'S PRE-HEARING
EXCHANGE LIST OF WITNESSES**

Comes now Respondent, after being over ruled in his attempt to have Kentucky Environmental and Public Protection Cabinet, Division of Water, Inspector Randy Poston added to his list of necessary witnesses asks the Regional Judicial Officer, Susan B. Schub, Esq. to reconsider by restyling the Motion as a Supplement to the Pre-Hearing Exchange, states as follows:

Added necessary witnesses for just conclusion

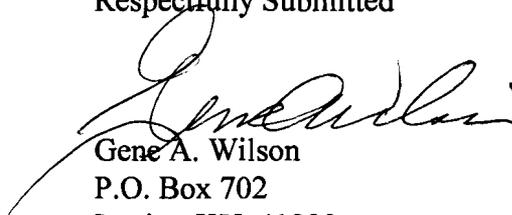
13. Randy Poston
Environmental and Public Protection Cabinet
Department for Environmental Protection
Division of Water

Mr. Poston will testify as a fact witness. He has almost twenty (20) years experience in field observations of underground injection wells and generally protecting the quality of water in the Martha Oil Field. Mr. Poston was the inspector during the time

of Respondent's operations at Martha and will testify that at no time did Respondent place in operation the injection well on Collier Creek; that the elaborate injection system operated by Respondent on Cam Creek was extremely effective and further, at no time did Respondent endanger the environment or water quality on his farm on Collier Creek.

WHEREFORE Respondent prays Mr. Randy Poston be added to the list of witnesses as a Supplement to the Pre-Hearing Exchange with his testimony directly on the issue at hand whereas Commonwealth of Kentucky Inspector, Doug Hamilton, is with the Department of Mines and Minerals and will cover plugging procedures and other general operations in the Martha Oil Filed.

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 foregoing Motion 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:

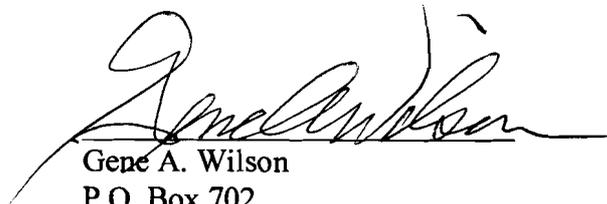
Ms. Patricia A. Bullock (Via Express Mail - Return Receipt Requested)
Regional Hearing Clerk
U.S. EPA, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

Hon. Susan B. Schub (Via Express Mail - Return Receipt Requested)
Regional Judicial Officer
U.S. EPA, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

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 3rd Street, SW
MC 2120
Washington, DC 20416-0005

Dated: July 18, 2007



Gene A. Wilson
P.O. Box 702
Louisa, KY 41230
(606) 638-9601