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House of Representatives  
COMMONWEALTH OF PENNSYLVANIA  
HARRISBURG

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Nov. 27, 2012

Stephen Platt, EPA Region III  
Ground Water & Enforcement Branch  
Office of Drinking Water & Source Water Protection (3WP22)  
1650 Arch St.  
Philadelphia, PA, 19103

RE: UIC Permit PAS2D020BCLE (Windfall/Zelman 1)

Dear Mr. Platt:

Please accept the dual intent of this letter: 1) to request a public hearing on the Zelman #1 Class 2 Disposal Injection Well proposed for Brady Township, Clearfield County, PA.; and 2) to my comments for the record on the Zelman 1 injection well proposal.

I will not dwell on the public hearing, tentatively scheduled for 7 p.m. Dec. 10 at the Brady Township Community Center in Luthersburg, Pa. The intense public interest in the meeting and the issue is evident from the July 23 EPA Information Sharing meeting on the issue that was attended by two of my staff members.

My comments on the Brady Twp. injection well proposal focus on the threat to public and private water supplies. Simply put, geologic and hydrological conditions in the area make the proposed site an egregiously poor one for such a well.

As the state representative from the adjacent district and longtime chair of the Pa. House of Representatives' Environmental Resources & Energy Committee, I have great familiarity with the area's incredibly complex geology. As a state geologist said of Clearfield County, "the geology was not as difficult as you thought it... It was worse!" It is infamous for its high pyrite and sulfur concentrations, which have had local ramifications. An environmental assessment omitted for an Interstate 99 construction project in adjacent Centre County has cost taxpayers tens of millions of dollars for remediation as the disturbed pyrite ruined water resources.

In the 1972 Pa. Department of Environmental Resources report, "Subsurface Liquid Waste Disposal and Its Feasibility in Pennsylvania," it was noted, "***It cannot be overstressed that the introduction of waste liquids into the subsurface is a permanent alteration of the subsurface environment... The magnitude of these changes may be small, but they are cumulative.***"

Brady Township is strategically situated near two watersheds – the Susquehanna and Ohio river basins. The injection well is perilously close to the DuBois Reservoir, the main water source for

the city, and the supply for Brady Township and the Borough of Troutville. Many private water wells are located within two miles of the proposed injection well. Old, deep gas wells have been drilled in the area, abandoned gas wells are very close to the proposed site and abandoned mines are significantly close to the proposed site. Springs, water wells and headwaters also are close to the proposed disposal injection well.

Earthquakes in Ohio have been linked to injection wells. Underground injection of wastewater produced by hydraulic fracturing and other energy technologies has a higher risk of causing such earthquakes, according to a June report from the National Research Council. Clearfield County straddles known faults and it does not receive the highest rating for storage of carbon dioxide, never mind fracking wastewater.

A May 2012 study by the Nicholas School of the Environment at Duke University spotlighted the "Geochemical evidence for possible natural migration of Marcellus Formation brine to shallow aquifers in Pennsylvania." It "suggests that these areas could be at greater risk of contamination from shale gas development because of a preexisting network of cross-formational pathways that has enhanced hydraulic connectivity to deeper geological formations."

Knowing all this, I believe the EPA must reject the Windfall Oil and Gas permit application.

However, I believe the economic anomalies presented by this permit application also must be considered. The federal Economic Development Administration is providing a \$1.2 million grant for a demonstration plant in Johnstown to treat Marcellus wastewater. The project, being pursued by Aspen Johnstown LLC, would reportedly employ hundreds.

Another wastewater treatment facility is proposed by Reserved Environmental Services in Pine Creek Township, Clinton County. RES has two such facilities already operational, including one in Westmoreland County, which is the largest such water treatment facility in the state.

Eureka Resources LLC is building a facility in Standing Stone Township, Bradford County, to treat Marcellus wastewater. It, like the plant proposed in Johnstown, plans for beneficial reuse of valuable byproducts that can be extracted from the wastewater.

Given the dubious environmental, hydrological and geological underpinnings of the well proposed in Brady Township, permit approval of it would subvert private and public investments being made across the state. Injection wells may be convenient and profitable for their owners, but the benefits, if any, to future generations of Commonwealth citizens is highly suspect.

Thank you for your consideration of these comments.

Sincerely,



Camille "Bud" George  
STATE REPRESENTATIVE  
D-74 of Clearfield County, and chair (D)  
Pa. House of Representatives'  
Environmental Resources &  
Energy Committee