

PITT-06-12-079

June 25, 2012

S. Stephen Platt U.S. EPA Region III

Ground Water & Enforcement Branch (3WP22)

1650 Arch Street

Philadelphia, PA 19103

Subject: Underground Injection Control (UIC) Class IID Brine Disposal Well Seneca Resources Corporation Well #38268 (API# 37-047-23835) Highland Township, Elk County, Pennsylvania

Dear Mr. Platt:

subject UIC Class IID Well permit application prepared by Tetra Tech, Inc. (Tetra Tech). On behalf of Seneca Resources Corporation (Seneca), enclosed please find two copies of the

at (412) 921-4006. Thank you very much for your assistance. questions or comments, please feel free to contact Guy Shirey of Seneca at (412) 548-2514 or me Your prompt review of the application would be greatly appreciated. Should you have any

Sincerely,

Dale E. Skoff, P.G.

Oil and Gas Hydrogeologic Services Manager

cc: Dave Rectenwald – EPA (1 copy) Guy Shirey – Seneca (2 copies)



BRINE DISPOSAL WELL PERMIT APPLICATION SENECA WELL # 38268 (API# 37-047-23835)

Seneca Resources Corporation 5800 Corporate Boulevard Pittsburgh, PA 15237

June 2012

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Street Address	Suita 200	Phone Number	Street Address	cs Corboration		Phone Number	7
City		-	Sour Corporate Blvd.	Blvd. Suite 300		(412) 548-2500	Ιĕ
Pittsburgh	PA	15237	City Pittsburgh		State PA	ZIP CODE 15237	
IV. Commercial Facility	lity V. Ownership		VI. Legal Contact		VII. SIC Codes		
Yes	Private		Owner	1389 - Oil	- Oil and Gas Field services, Not	vices, Not	- 1
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(Complete the following queen For Classes I, II, III, (and other required. List attachments	(<i>Complete the following questions on a separate sheet(s) and number accordingly; see instructions)</i> For Classes I, II, III, (and other classes) complete and submit on a separate sheet(s) Attachments AU (pp 2-6) as appropriate. required. List attachments by letter which are applicable and are included with your application.	and number according nit on a separate sheet(and are included with	yly; see instruction: s) Attachments AU your application.	s) J (pp 2-6) as appro	Atta	ch maps where	
		XIV. Certification	cation				
and that, based on my inquiry of the and that, based on my inquiry of the accurate, and complete. I am aware imprisonment. (Ref. 40 CFR 144.32)	The further the penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)	amined and am famillar liately responsible for c cant penalties for subm	with the informatio btaining the inform itting false informa	on submitted in thi nation, I believe th tion, including the	formation submitted in this document and all atta re information, I believe that the information is tr information, including the possibliity of fine and	l attachments is true, and	
# #	tle (Type or Print) Vice President, Environmental Engineering	ring		_ 8	B. Phone No. (Area (814) 771-0281	Code and No.)	
S. Signature C	3/			0	D. Date Signed	(1)	

Well Class and Type Codes

Class I

Type 66 23 Nonhazardous industrial disposal well Wells used to inject waste below the deepest underground source of drinking

Ä, ćΜ,, ε. N., Other Class I wells (not included in Type "I," 'M," or "W") Hazardous waste disposal well injecting below USDWs Nonhazardous municipal disposal well

Class II Oil and gas production and storage related injection wells

Type Ę, ׆ֶּ֖ ٿِ Enhanced recovery well Produced fluid disposal well

ίχ, Hydrocarbon storage well (excluding natural gas)
Other Class II wells (not included in Type "D," "R," or "H")

Class III Special process injection wells.

ŝ Sulfur mining well by Frasch process Solution mining well

Type

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Ź, Uranium mining well (excluding solution mining of conventional mines) Other Class III wells (not included in Type "G," "S," or "U")

Other Classes Class V wells which may be permitted under §144.12. Wells not currently classified as Class I, II, III, or V. Wells not included in classes above.

Class **Attachments** Attachments to Permit Application

I new well existing A, B, C, D, F, H – S, U A, B, C, D, F, H – U

If new well existing A, B, C, E, G, H, M, Q, R; optional – I, J, K, O, P, U A, E, G, H, M, Q, R, – U; optional – J, K, O, P, Q

III new well existing A, B, C, D, F, H, I, J, K, M – S, U A, B, C, D, F, H, J, K, M – U

To be specified by the permitting authority

Other Classes

INSTRUCTIONS - Underground Injection Control (UIC) Permit Application

OMB control number in any correspondence. Do not send the completed forms to this address. suggested methods for minimizing respondentburden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, DC 20460. Include the control number. Send comments on the Agency's need for this information, the accuracyof the provided burden estimates, and any not conduct or sponsor, and a person is not required to respond to, a collection finformation unless it displays a currently valid OMB data sources; complete and review the collection of information; and, transmit or otherwise disclosche information. An agency may any previously applicable instructions and requirements, train personnel to be able to respond to the collection of information; search information, processing and maintaining information, and disclosing andproviding information; adjust the existing ways to comply with review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collectingyalidating, and verifying application, and 132 hours for a Class III well application. 224 hours for a Class I hazardous well application, 110 hours for a Class I non-hazardous well application,67 hours for a Class II well Paperwork Reduction Act: The public reporting and record keeping burden for this collection of information is estimatedo average ersons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to Burden means the total time, effort, or financial resource expended by

apply for permit by the Director. This form must be completed by all owners or operators of Class I, II, and III injection wells and others who may be directed to

- EPA I.D. NUMBER Fill in your EPA Identification Number. If you do not have a number, leave blank
- = OWNER NAME AND ADDRESS - Name of well, well field or company and address
- Ħ OPERATOR NAME AND ADDRESS - Name and address of operator of well or well field
- <u>.</u> COMMERCIAL FACILITY - Mark the appropriate box to indicate the type of facility
- .< OWNERSHIP - Mark the appropriate box to indicate the type of ownership
- VI. LEGAL CONTACT Mark the appropriate box.
- **≦** SIC CODES - List at least one and no more than four Standard Industrial Classification (SIC) Codes that best describe the nature of the business in order of priority.
- ≦ WELL STATUS - Mark Box A if the well(s) were operating as injection wells on the effective date of the UIC Program for the State. Mark Box B if wells(s) existed on the effective date of the UIC Program for the State but were not utilized for injection. Box C should be marked if the application is for an underground injection project not constructed or not completed by the effective date of the UIC Program for the State.

×

- possible to consider an area permit if EPA has jurisdiction in both States. Each such case will be considered individually, if Field," submit the name in the space provided. In the case of a project or field which crosses State lines, it may be specified and the wells described and identified by location. If the area has a commonly used name, such as the "Jay do not inject hazardous waste. If an area permit is requested the number of wells to be included in the permit must be discretion of the Director and that wells covered by an area permit must be at one site, under the control of one person TYPE OF PERMIT - Mark "Individual" or "Area" to indicate the type of permit desired. Note that area permits are at the the owner/operator elects to seek an area permit.
- × please explain in the space provided. requested. Use the most pertinent code selected from the list on the reverse side of the application. When selecting type X CLASS AND TYPE OF WELL - Enter in these two positions the Class and type of injection well for which a permit is
- × LOCATION OF WELL - Enter the latitude and longitude of the existing or proposed well expressed in degrees, minutes, and seconds or the location by township, and range, and section, as required by 40 CFR Part 146. If an area permit is being requested, give the latitude and longitude of the approximate center of the area
- <u>×</u> INDIAN LANDS - Place an "X" in the box if any part of the facility is located on Indian lands
- ¥ the upper right hand corner of each page of the Attachments. for Class I, II, III are described on pages 4 and 5 of this document and listed by Class on page 2. Place EPA ID number in ATTACHMENTS - Note that information requirements vary depending on the injection well class and status. Attachments
- ×× authorized in writing ranking elected official for a public agency. For Class II, the person described above should sign, or a representative duly CERTIFICATION - All permit applications (except Class II) must be signed by a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, and by a principal executive or

EPA Form 7520-6

INSTRUCTIONS - Attachments

Attachments to be submitted with permit application for Class I, II, III and other wells

- P **AREA OF REVIEW METHODS** - Give the methods and, if appropriate, the calculations used to determine the size of the area of review (fixed radius or equation). The area of review shall be a fixed radius of 1/4 mile from the well bore unless the use of an equation is approved in advance by the Director.
- Ω̈ **MAPS OF WELL/AREA AND AREA OF REVIEW** - Submit a topographic map, extending one mile beyond the boundaries, showing the injection well(s) or project area for which a permit is sought and the applicable map must show the following: applying injection fluid to all wells in the area, including all system monitoring points. Within the area of review, the disposal facilities. If the application is for an area permit, the map should show the distribution manifold (if applicable) review. The map must show all intake and discharge structures and all hazardous waste treatment, storage, or area of property

Class I

of water, springs, mines (surface and subsurface), quarries, and other pertinent surface features, including information of public record is required to be included in this map surface water bodies, anddrinking water wells located within one quarter mile of the facility property boundary. Only residences and roads, and faults, if known or suspected. In addition, the map mustidentify thosewells, springs, other The number, or name, and location of all producing wells, injection wells, abandoned wells, dryholes, surface bodies

Class

does not apply to existing Class II wells; In addition to requirements for Class I, include pertinent information known to the applicant. This requirement

Class III

applicant In addition to requirements for Class I, include public water systems and pertinent information known to the

which penetrate the proposed injection zone. Such data shall include the following: or otherwise known to the applicant on all wells within the area of review, including those on the map required in B CORRECTIVE ACTION PLAN AND WELL DATA - Submit a tabulation of data reasonably available from public records

Class

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any additional information the Director may require. In the case of new injection wells, include thecorrective action proposed to be taken by the applicant under 40 CFR 144.55. Adescription of each well's types, construction, date drilled, location, depth, record of plugging and/or completion, and

Class II

formation, all known wells within the area of review which penetrate formations affected by the increase in pressure In addition to requirement for Class I, in the case of Class II wellsoperating over the fracture pressure of the injection This requirement does not apply to existing Class II wells

Class III

In addition to requirements for Class I, the corrective action proposed under 40 CFR 144.55 for all Class III wells

Ō source of drinking water which may be affected by the proposed injection. (Does not apply to Class II wells. position relative to the injection formation and the direction of water movement, where known, in every underground underground sources of drinking water within the area of review (both vertical and lateral limits for Class I), their MAPS AND CROSS SECTION OF USDWs - Submit maps and cross sections indicating the vertical limits of all

EPA Form 7520-6 Page 4 of 6

- Ш **NAME AND DEPTH OF USDWs (CLASS II)** - For Class II wells, submit geologic name, and depth to bottom of all underground sources of drinking water which may be affected by the injection.
- П and cross sections illustrating the regional geologic setting. (Does not apply to Class II wells.) geologic structure of the local area (including the lithology of injection and confining intervals) andgeneralized maps MAPS AND CROSS SECTIONS OF GEOLOGIC STRUCTURE OF AREA - Submit maps and cross sections detailing the
- Ω depth and fracture pressure. geological data on the injection zone and confining zones including lithologic description, geological name, thickness, GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES (Class II) - For Class II wells, submit appropriate
- 王 wells, source and analysis of the physical andchemical characteristics of the injection fluid; (6) for Class III wells, a radiological and biological characteristics, including density and corrosiveness, of injection fluids; (5) for Class maximum concentrations only may be submitted, but all records must be retained. qualitative analysis and ranges in concentrations of all constituents of injected fluids. If the information is proprietary, injection pressure; (3) nature of annulus fluid; (4) for Class I wells, source and analysis ofthe chemical, physical area permits): (1) average and maximum dailyrate and volume of the fluids to be injected; (2) average and maximum OPERATING DATA - Submit the following proposed operating data foreach well (including all those to be covered by
- FORMATION TESTING PROGRAM Describe the proposed formation testing program For Class I wells the program radiological characteristics of the injection matrix and physical and chemical characteristics of the formation fluids must be designed to obtain data on fluid pressure, temperature, fracture pressure, other physical, chemical, and

pressure, physical and chemical characteristics of the injection zone. (Does not apply to existing Class II wells or For Class II wells the testing program must be designed to obtain data on fluid pressure, estimated fracture

required if the program formation is not water bearing. (Does not apply to existing Class III wells or projects.) chemical characteristics of the formation fluids if theformation is naturally water bearing. Only fracture pressure For Class III wells the testing must bedesigned to obtain data on fluid pressure, fracture pressure, and physical and 쬬.

- ے STIMULATION PROGRAM - Outline any proposed stimulation program.
- ᄌ INJECTION PROCEDURES - Describe the proposed injection procedures including pump, surge, tank, etc
- Γ (Request and submission of justifying data must be made to use an alternative to packer for Class I.) logging procedures, deviation checks, and the drilling, testing and coring program, and proposed annulus fluid Class II, and §146.32 for Class III) to be utilized. This should include details of the casing and cementing program, CONSTRUCTION PROCEDURES - Discuss the construction procedures (according to §146.12 for Class I, §146.22 for
- Ζ construction details of the well. CONSTRUCTION DETAILS - Submit schematic or other appropriate drawings of the surface and subsurface
- Z movement of injection fluid. (Class III wells only.) CHANGES IN INJECTED FLUID - Discuss expected changes in pressure, native fluid displacement, and direction of
- 0 PLANS FOR WELL FAILURES - Outline contingency plans (proposed plans, if any, for Class II) to cope with al shut-ins or wells failures, so as to prevent migration of fluids into any USDW.
- Ţ. frequency, and parameters measured. If a manifold monitoring program is utilized, pursuant to §146.23(b)(5), showing the number and location of monitoring wells as appropriate and discussion of monitoring devices, sampling MONITORING PROGRAM - Discuss the planned monitoring program. This should be thorough, including maps describe the program and compare it to individual well monitoring.
- Q describe the type, grade, and quantity of cement to be used; and (3) describe the method to besed to place plugs **PLUGGING AND ABANDONMENT PLAN** - Submit a plan for plugging and abandonment of the well including: (1) describe the type, number, and placement (including the elevation of the top and bottom) of plugs to be used; (2) information on EPA Form 7520-14, Plugging and Abandonment Plan. Class III well that underlies or is in an exempted aquifer, demonstrate adequate protection of SDWs. Submit this including the method used to place the welin a state of static equilibrium prior to placement of the plugs. Also for a

EPA Form 7520-6 Page 5 of 6

- Ŋ **NECESSARY RESOURCES** - Submit evidence such as a surety bond or financial statement to verify that the resources necessary to close, plug or abandon the well are available.
- လ included. For additional information on aquifer exemptions, see 40 CFR Sections 144.7 and 146.04 expected to be mineral or hydrocarbon production, such as general description of themining zone, analysis of the amenability of the mining zone to the proposed method, and time table for proposed development must also be meets the following criteria: (1) does not serve as a source of drinking water; (2) cannot now and will not in the future serve as a source of drinking water; and (3) the TDS content of the ground water is more an 3,000 and less than 10,000 mg/l and is not reasonably expected to supply a public water system. Data to demonstrate that the aquifer is AQUIFER EXEMPTIONS - If an aquifer exemption is requested, submit data necessary to demonstrate that theaquifer
- \exists PSD, RCRA, etc. **EXISTING EPA PERMITS** - List program and permit number of any existing EPA permits, for example, NPDES
- Ç **DESCRIPTION OF BUSINESS** - Give a brief description of the nature of the business

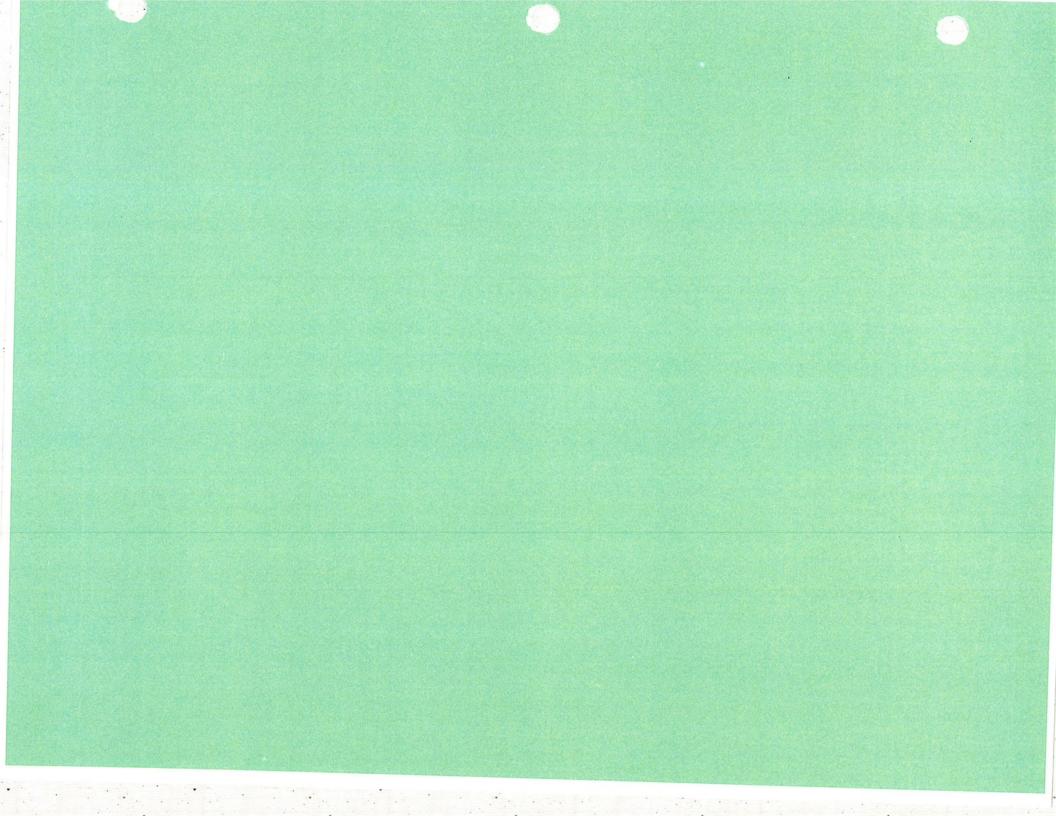


Table of Contents Underground Injection Control (UIC) Class II Well Permit Application Seneca Well #38268 Highland Township, Elk County, PA

Section 1 – Area of Review Methods/Calculations

Section 2 – Maps of Well Area and Area of Review

Section 3 – Corrective Action Plan and Well Data

Section 4 – Name and Depth of USDWs

Section 5 – Geologic Data on Injection and Confining Zones

Section 6 – Operating Data

Section 7 – Well Construction Details

Section 8 – Monitoring Program

Section 9 – Plugging and Abandonment Plan

Section 10 – Necessary Resources

Section 11 - Plan for Well Failures

Appendices

Appendix A – Groundwater Well Records

Appendix B – Surrounding Landowner Information





21335 Signal Hill Plaza, Suite 100, Sterling, VA 20164 703-444-7000 703-444-1685 (FAX)

TECHNICAL MEMORANDUM - DRAFT

TO: Dale Skoff, Tetra Tech NUS

FROM: Jeffrey Benegar

DATE: June 14, 2012

RE: Area of Review/Zone of Endangerment Analysis for Potential Brine Disposal

Injection Well #38268

EXECUTIVE SUMMARY

disposal injection well #38268 for Seneca Resources. Well #38268 is located in performed for the area of review/zone of endangerment analysis for potential brine This technical memorandum (TM) summarizes the analytical modeling we have Highland Township, Elk County, PA. Brine disposal via injection well would take place into the Elk 3 Sandstone. Our analysis is described in more detail below.

OVERVIEW AND METHODOLOGY

used by US EPA Region 6. It involves the calculation of the increase of pressure in the of injection well being permitted. Other methods involve calculation of the radius based injection well. The most simplistic method is the use of a fixed radius, based on the type graphically, the intersection of those two curves at some distance, r, determines the radius of the lowest most underground source of drinking water (USDW). on well and formation properties. There are several methods proposed for calculating the zone of endangerment of an of the zone of endangerment. increase in head in the formation due to injection is then compared to the equivalent head formation due to injection, then converting that pressure into equivalent feet of head. The The method used here is the graphical method first When plotted

increase in pressure was developed by Matthews and Russell (1967). Matthews and properties of the injection fluid and the formation, the rate of fluid injection, and the isotropic, non-leaking formation, the increase in pressure (delta p) can be described as: Russell assume that, for a single well injecting into an infinite, homogeneous and length of time of injection. The most common mathematical expression to describe this The increase in pressure in the formation due to injection depends on the

delta $p = 162.6 \text{ Q}\mu / \text{kh} * [(\log(\text{kt} / \Phi \mu \text{Cr}^2) - 3.23] \text{ where:}$

delta p = pressure change (psi) at radius, r and time, t Q = injection rate (barrels/day)

 μ = injectate viscosity (centipoise)

k = formation permeability (millidarcies)

h = formation thickness (feet)

t = time since injection began (hours)

C = compressibility (total, sum of water and rock compressibility) (psi⁻¹)

r = radial distance from wellbore to point of investigation (feet)

 Φ = average formation porosity (decimal)

PARAMETERS USED IN THE ANALYSIS

conservative estimate based on US EPA Region 3 guidance and review of site area hydrogeologic conditions was used (i.e., depth to USDW = 400 feet) of the parameters are based on the analysis and results of the injection testing performed on well #38268 in March 2012 (Tetra Tech, 2012). The permeability value was based on the results from the injection testing analysis. For the depth to the lowest most USDW, a The following parameters were used in the zone of endangerment analysis. The majority

Input Parameters for Well #38268

Q = 3,000 barrels/day

t = 10 years = 87,600 hours

 $\mu = 0.9457$ centipoise

= 190 md

h = 49 feet

 $C = 7.6e-06 \text{ psi}^{-1}$

 $\Phi = 13.5\%$

Well radius = 0.29 feet

Specific gravity of injectate = 1.14

Surface elevation = 2040 feet

Depth to injection formation = 2354 feet

Base of lowest most USDW (elevation) = 1640 feet

Initial pressure at top of injection formation = 24 psi

RESULTS

calculated pressure surface within the injection formation, measured as feet of head of head of formation brine. The results are shown in Figure 1. The plot shows the to obtain the total pressure in the formation. These values were then converted to feet of test. The values of delta p were added to the existing pressure in the injection formation based on the parameters listed above for permeability value determined from the injection The Matthews and Russell equation was solved for various distances from the wellbore formation brine above the top of the injection formation. Also shown is the head of the

lowest most USDW. Where the two lines intersect, the radius of the zone of endangerment can be estimated. For the permeability value of k = 190 md, the increase in head due to injection would remain below the elevation of the lowest most USDW. This permeability value was obtained from injection testing analysis of well #38268.

CONCLUSIONS

Our analysis of the area of review/zone of endangerment for the proposed brine disposal injection wells is based on a methodology typically used by US EPA. For the permeability value of k = 190 md (obtained from injection testing analysis of well #38268), increase in head due to injection would remain below the elevation of the for use as a brine disposal well. lowest most USDW. Based on the results, we believe the well is an excellent candidate

In summary, the default area of review of a $\frac{1}{4}$ mile radius from the proposed injection well is applicable for this application.

REFERENCES

Matthews, C.S., Russell, D.G., (1967) Pressure Buildup and Flow Tests in Wells, SPE Monograph Series, Volume 1, New York.

Tetra Tech, (2012) Injectivity Test Report, Seneca Resources Well #38268, Highland Township, Elk County, PA. May 2012.

FIGURES

Zone of Endangerment Plot - #38268 well

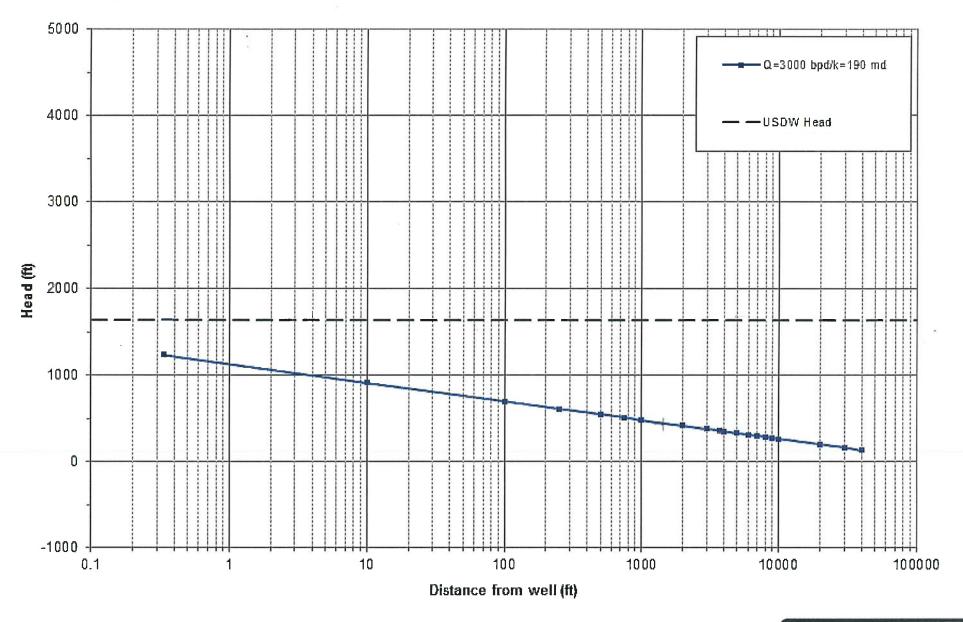


Figure 1. Feet of head of injection formation and USDW vs. distance from the well for #38268 well



Area of Review

Seneca well #38268 Water Reporting System (DWRS), there are no groundwater wells within the lambda mile Area of Review for Information System (PaGWIS) and the Pennsylvania Department of Environmental Protection's Drinking According to publicly available records, including the Pennsylvania Geologic Survey's Ground Water

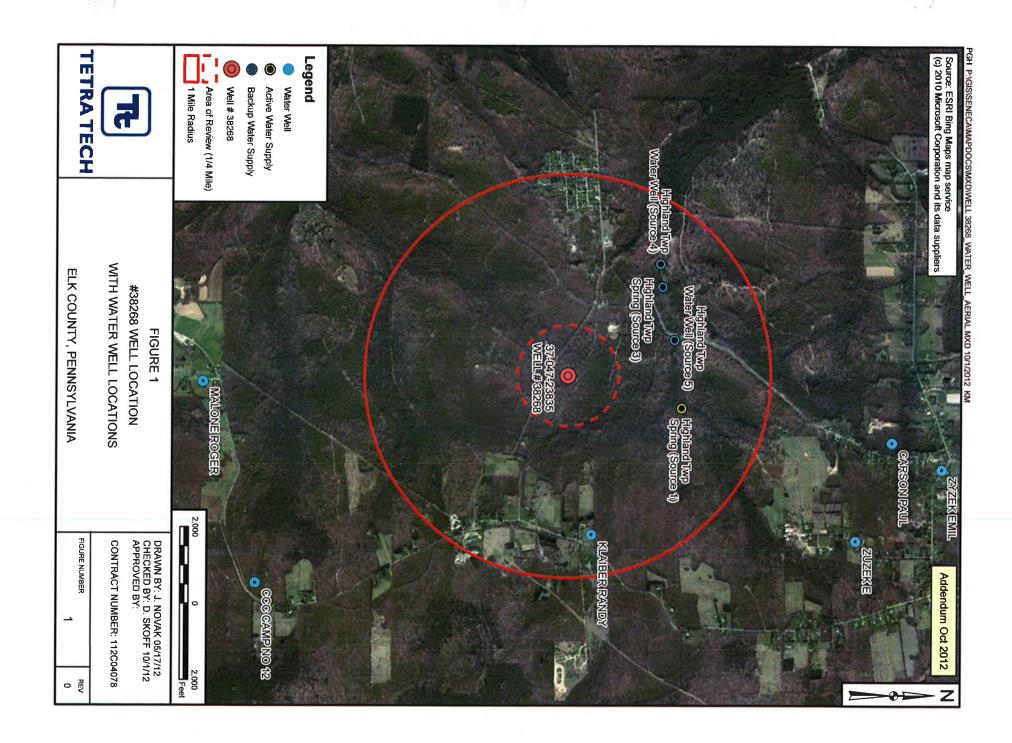
detail in the following section of this application. located approximately 0.2 miles southeast of the proposed injection well. This well is discussed in greater which is located approximately 0.2 miles to the southwest. A plugged gas well, Seneca well #01328, is The only active oil and gas well located within lpha mile of Seneca well #38268 is Seneca well #38281,

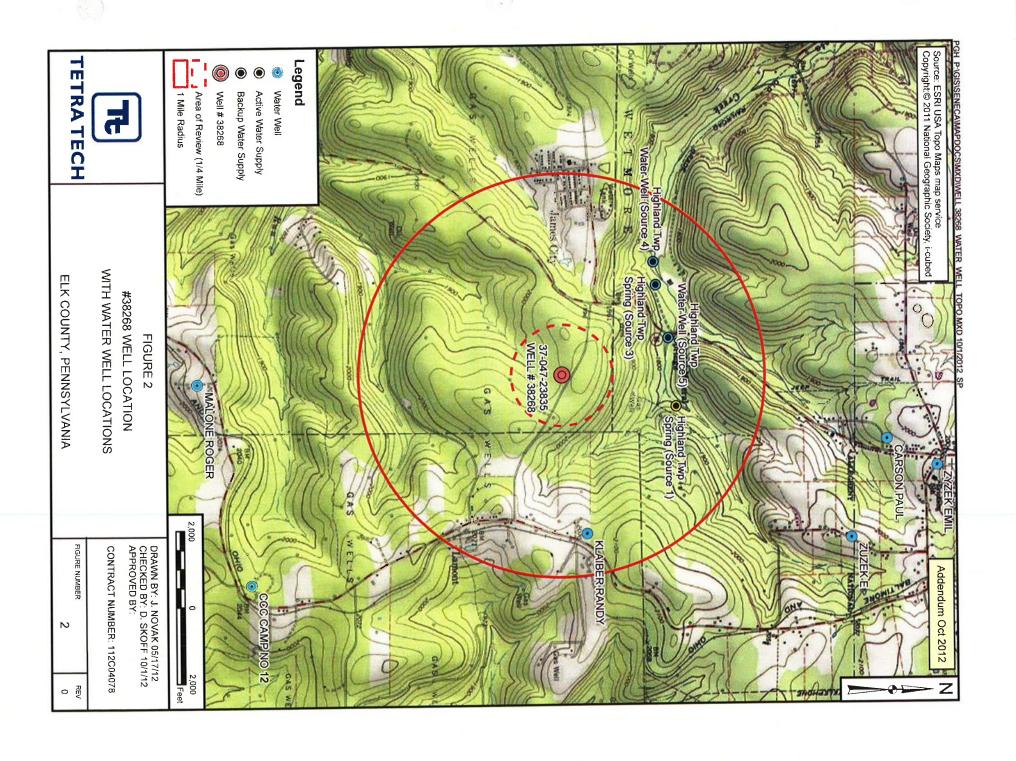
regarding water wells and springs within one mile of Seneca well #38268 is provided in Appendix A. storage, or disposal facilities; mines; or quarries within one mile of Seneca well #38268. Information well #38268. There are no other identified intake or discharge structures; hazardous waste treatment, PaGWIS indicates that a private water well, owned by Randy Klaiber, is located 0.8 miles from Seneca pipes, and storage tanks between 0.5 and 0.7 miles from Seneca well #38268 (proposed injection well). consisting of two springs (one active and one inactive), two reserve water wells, and associated pumps, According to records available through the DWRS, Highland Township maintains a public water supply

tributary (UNT) to Wolf Run is located approximately 0.6 miles west of Seneca well #38268 (UNT) to Wolf Run is located approximately 0.1 miles south, and a HQ-CWF designated unnamed of Tionesta Creek is located approximately 0.5 miles east, a HQ-CWF designated unnamed tributary A High Quality – Cold Water Fishery (HQ-CWF) designated unnamed tributary (UNT) to the East Branch

The names and addresses of residents located within lpha mile of the proposed injection well are provided in Appendix B

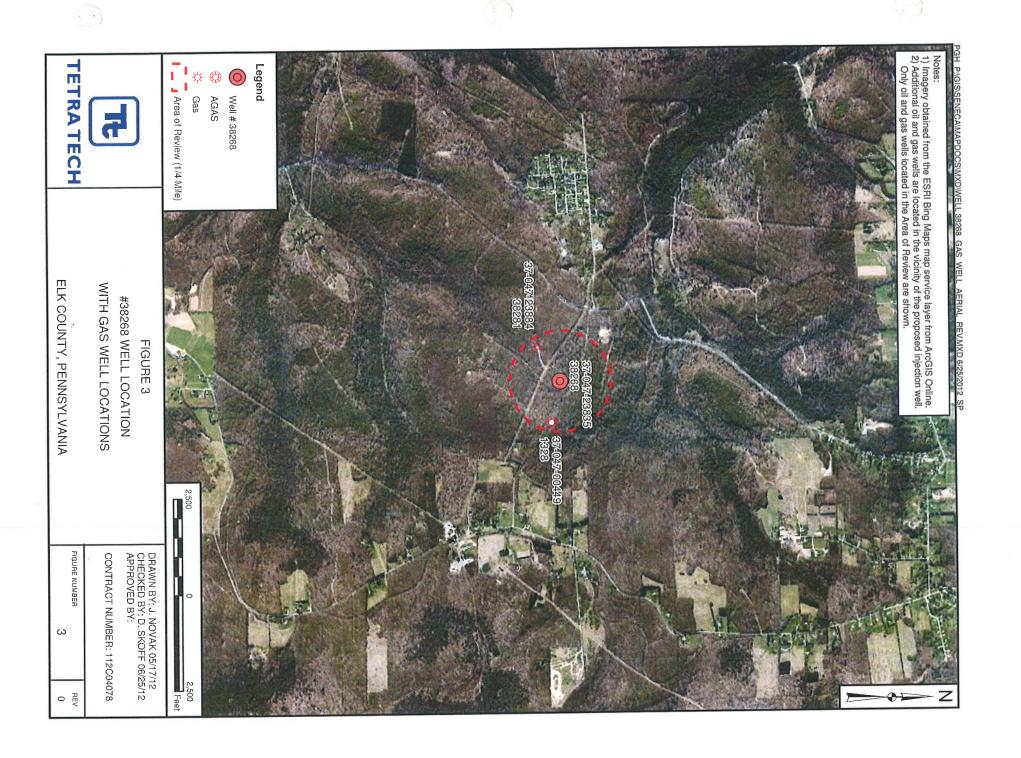
AREA OF REVIEW MAPS
GROUNDWATER WELLS

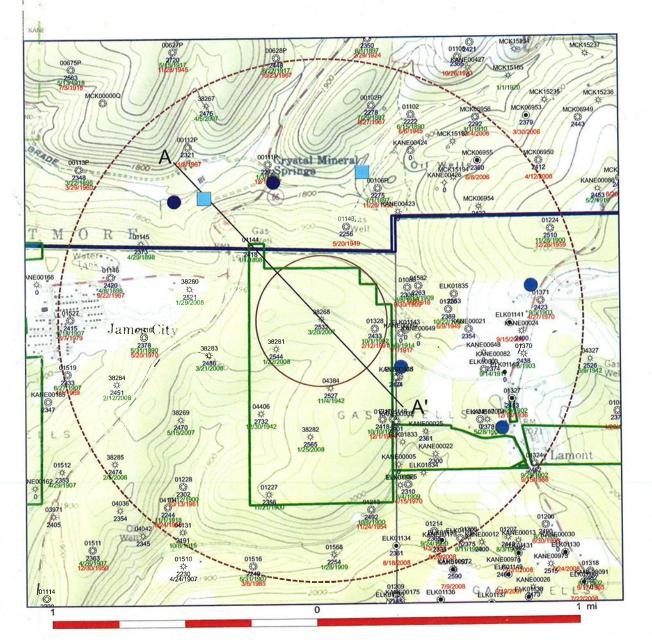




AREA OF REVIEW MAPS

OIL AND GAS WELLS





Oil and Gas Wells Straight hole well

Well Status

AGAS

₩ AO&G

AOIL

D&A

₩ GAS

OIL
 UNK

Private Water Wells

Straight hole well

Straight hole well

Highland Township Water Authority

Point

TYPE

SPRING

WATER WELL

Well ID

Well Depth Spud Date

Abandoned Date

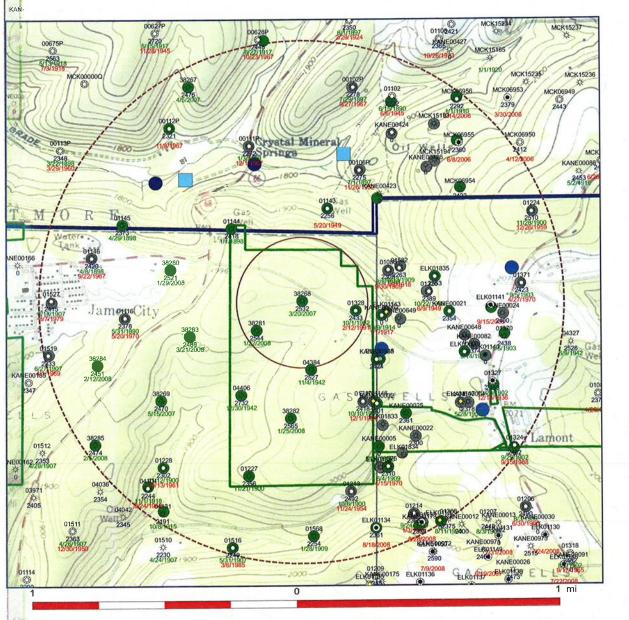
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1/4 Mile Area of Review



One mile radius around well 38268





DEP Listed Orphan Wells Straight hole well

Straight hole well

Oil and Gas Wells Straight hole well

Well Status

AGAS

AO&G

AOIL

-**♦- D&A**

GAS
OIL

₩ UNK

Private Water Wells Straight hole well

Straight hole well

Highland Township Water Authority

Point

TYPE

SPRING

WATER WELL

Located Oil and Gas Wells

Point

Point

No Well Found

Point

Poir

Well ID

Well Depth Spud Date Abandoned Date

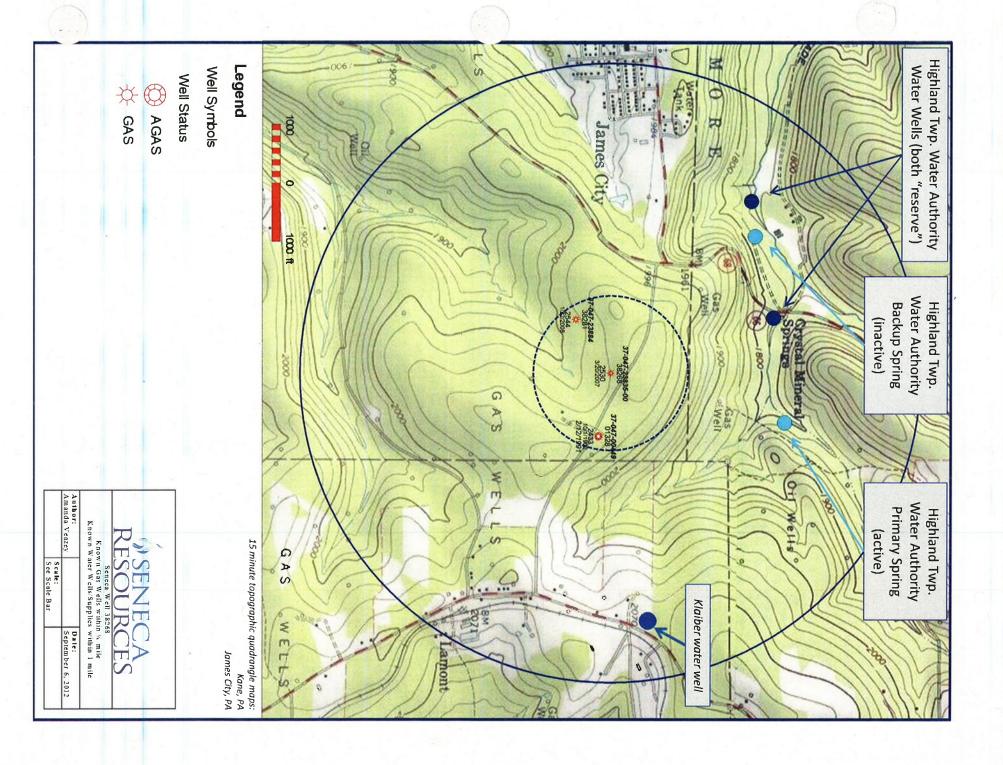
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1/4 Mile Area of Review



One mile radius around well 38268





OIL AND GAS WELLS IN THE AOR

GROUNDWATER WELLS WITHIN 1 MILE