

My name is David J. Rectenwald and I've been an inspector for the United States Environmental Protection Agency's Underground Injection Control Program in the states of Pennsylvania and Virginia since January of 1986. During my tenure with EPA I have worked out of my duty station located in Titusville, Pa. The majority of my inspections have been associated with the Oil and Gas Industry and Class II injection wells.

Over the course of my career I have conducted thousands of UIC inspections and have interfaced with many of the oil and gas companies and consultants doing business in our region. Inspections of Class II facilities and wells are conducted during the permitting, construction, operation and closure to document that these activities are in compliance with UIC regulations.

In order to prevent abandoned injection wells from becoming conduits for migration of injected fluids and to protect underground sources of drinking water, proper plugging and abandonment procedures are necessary. My experience as an inspector has afforded me the opportunity to work directly with the owner/operators, plugging contractors and state oil and gas representatives, on hundreds of wells over the last 28 years to ensure the wells are abandoned according to state and federal requirements.

Based on my field experience and my extensive work with industry representatives, it is my opinion that the cost to permanently abandon a typical 6000' deep disposal well would on average be in the \$30,000 to \$40,000 range depending on specific construction details. This does not include any activities associated with surface remediation or any unforeseen down hole problems.