

**BEFORE THE ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.**

In re:)

Panoche Energy Center, LLC, Class I)
Underground Injection Wells 1-6, Permit)
No. R9UIC-CA1-FY17-2R)

DECLARATION OF ROBIN SHROPSHIRE IN SUPPORT OF PANOCHÉ ENERGY CENTER, LLC'S REPLY IN SUPPORT OF PETITION FOR REVIEW

Robin Shropshire declares under penalty of perjury the following:

1. My name is Robin Shropshire. I am over the age of eighteen years, I have personal knowledge of the facts stated herein, and I could and would competently testify thereto if called as a witness.

2. I am employed by Power Plant Management Services, LLC. I was extensively involved in Panoche Energy Center, LLC's ("PEC") submission of an Underground Injection Permit Renewal Application to the Environmental Protection Agency ("EPA"). Attached hereto as Exhibit A are records that are publicly available from the California Department of Transportation, Geologic Energy Management Division ("CalGEM"). These records include historical data and closure reports for certain abandoned wells near PEC's site. My understanding from reviewing my files is that PEC submitted the records at Exhibit A to EPA as part of its March 1, 2019 Update and Re-Submittal of its Permit Renewal Application.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 31st day of January, 2023.



Robin Shropshire