



CITY OF DUBOIS, PENNSYLVANIA

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September 10, 2013

EPA Regions III
Ground Water & Enforcement Branch (3WP22)
Office of Drinking Water & Source Water Protection
1650 Arch Street
Philadelphia, PA 19103

RE: PAS2D020BCLE - Brady Township, Clearfield County, PA

The City of DuBois Council, Mayor, and City Manager ask that the permit for a deep injection well in Brady Township be denied for this proposed location.

Clearfield County has a low incident of seismic activity; therefore, our homes, buildings, water towers, infrastructure, etc. are not built with earthquake specifications in mind. Two years ago DuBois residents felt the seismic tremors which started in Youngstown, Ohio. We do not want to imagine what would happen to our aging water and sewer lines, sidewalks and roads should seismic activity happen in our back yard. The assertion that monitoring pressure would protect against failure of an injection well operation is hard to believe considering damage to a water source is likely to have already occurred by the time lapse between a monitor warning of a failure at an injection well operation until the shutdown can be accomplished.

Geological and hydrological surveys commissioned by City Council in 1958 and 2009 show a fault line from Luthersburg area past Rockton/Home Camp area. Our City reservoir and newly dug water wells reside in this vicinity. Our City has been working to provide backup water resources to plan for future area growth needs. This is a costly endeavor to drill additional water wells to supplement our reservoir, but we provide a significant portion of the surrounding areas with water.

The watershed has abandoned gas wells (not City owned) with old deteriorated casings. Undo pressure from injection activity could push injection fluids along the fault lines into abandoned gas wells with the potential to contaminate underground sources of drinking water.

Parts of our City and much of the surrounding area are built atop a catacomb of old coal mines no longer worked. The City and state has spent considerable amounts of taxpayer money to clean-up the mine discharge that polluted Sandy Lick Creek which flows through DuBois. Simply put, geologic and hydrological conditions in this area make the proposed site an egregiously poor one for such a well.

We support the request for a public hearing on this specific permit issue since so much was learned at the last EPA public hearing from our community residents. Often residents need the opportunity to speak out on these issues and we know many didn't have the chance at the last public hearing due to the issue of starting late since the recorder for the meeting had to arrive an hour after the originally advertised start time.

The City of DuBois recognizes and welcomes the economic impact that the gas industry offers. We simply object to introducing injection wells and similar activities into our residential area at the expense of our health and safety.

Sincerely,

DUBOIS CITY COUNCIL

Mayor Gary D. Gilbert
Councilman James Aughenbaugh
Councilwoman Diane Bernardo
Councilman Randy Schmidt
Councilman Edward Walsh
City Manager John Suplizio