



June 13, 2013

Mr. Roger Reinhart
Groundwater and Enforcement Branch (3WP22)
Office of Drinking Water & Source Protection
United States Environmental Protection Agency Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Response to Request for Additional Information dated May 8, 2013
Underground Injection Control (UIC) Program
Class IID Injection Well #38268 (API No. 37-047-23835)

Dear Mr. Reinhart:

Seneca Resources Corporation (Seneca) received an e-mail on May 8, 2013 following up on a verbal request for additional information to support our application for a brine disposal injection well (Class IID) in Highland Township, Elk County, Pennsylvania (Permit ID: PAS2D025BELK). In the phone call and subsequent e-mail US EPA Region 3 requested information regarding reservoir pressures in the Elk 3 reservoir as well as any available production information to support our statement that the Elk 3 reservoir is depleted.

Seneca was able to locate reservoir pressure and production histories for several wells near the subject well (Attachment 1). As depicted in the attached graph (Attachment 2), initial reservoir pressures of 425-440 pounds per square inch (psi) were documented when the reservoir was first produced in 1898. Over time, reservoir pressure decreased as production continued. In June 2013, Seneca shut in the subject well and others around it to record current reservoir pressures. The subject well had a shut-in casing pressure of 26.6 psi and nearby wells had pressures ranging from 20.6 psi to 54.3 psi.

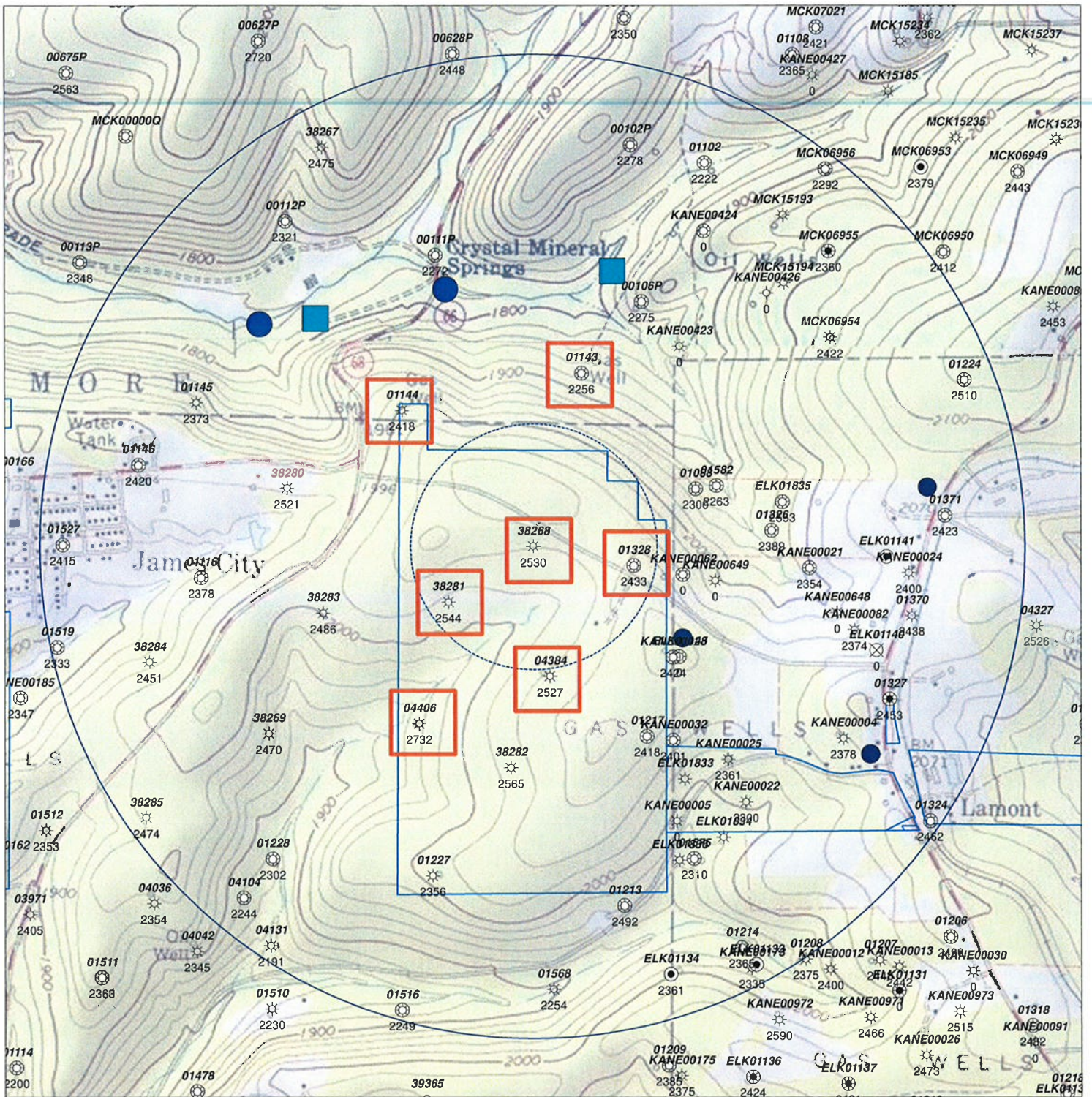
The Elk 3 has been a substantial gas-producing reservoir. Estimated cumulative production from selected wells near 38268 is summarized in the attached table (Attachment 3).

The Elk 3 Sandstone is a depleted reservoir, as evidenced by the reservoir pressure decline curves and significant volumes of gas produced since 1898.

Should you have any questions or concerns, or need additional information, please contact Amanda Veazey at (412) 548-2533 or me at (412) 548-2513.

Sincerely,

Doug Kepler
Vice President, Environmental Engineering



Private Water Wells

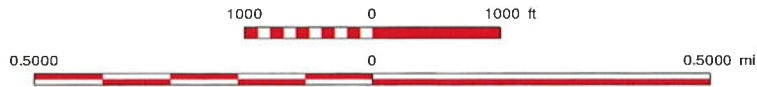
- Straight hole well
- Straight hole well

Highland Township Water Authority


- Point
- TYPE
- SPRING
- WATER WELL



Wells with historic pressure and/or production data



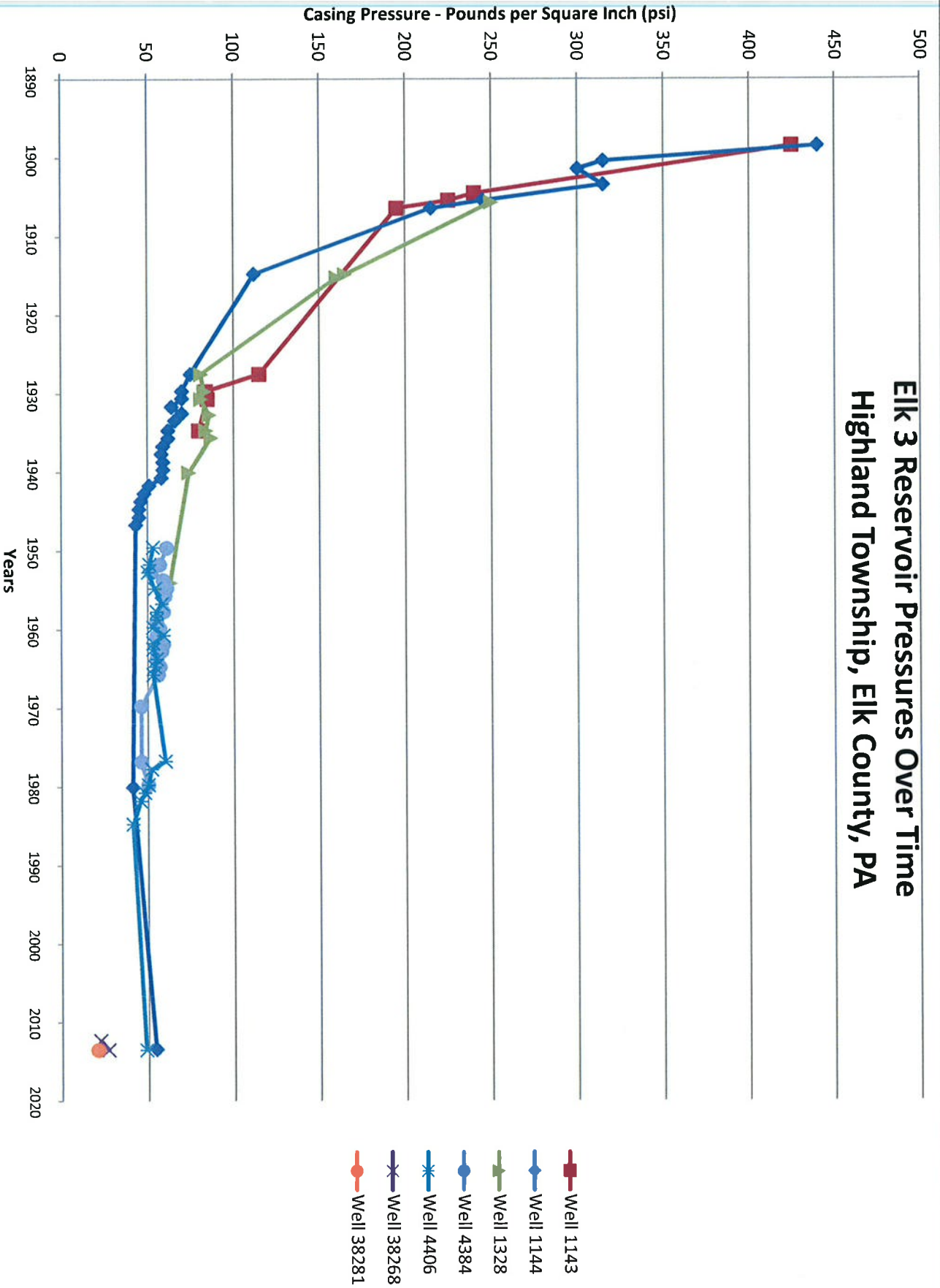
15 minute topographic quadrangle maps:
Kane, PA
James City, PA



Seneca Well 38268
Known Gas Wells within ¼ mile
Known Water Wells/Supplies within 1 mile

Author: Amanda Veazey	Date: June 13, 2013
Scale: See Scale Bar	

Elk 3 Reservoir Pressures Over Time Highland Township, Elk County, PA



Attachment 3

Estimated Cumulative Gas Production For Selected Wells Near Seneca Well #38268

Well #	Year Drilled	Year Plugged & Abandoned	Estimated Cumulative Production (MMCF)
1143	1898	1949	280
1144	1898		422
1328	1902	1991	412
4406	1943		150
38268	2007		82*

* Well 38268 was completed open-hole in both the Elk 3 and Speechley 6 reservoirs. Production is commingled. Estimated Ultimate Recovery for this well is 135 MMCF.