

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

In the Matter of:	)	
	)	
Pennsylvania General Energy Company, LLC	)	
	)	
	)	
	)	Permit Appeals: UIC 14-63, UIC 14-64,
UIC Permit No. PAS2D013BIND	)	and UIC 14-65
	)	
	)	

**REGION III'S MOTION TO CONSOLIDATE APPEALS,  
FOR LEAVE TO FILE CONSOLIDATED RESPONSE, AND FOR AN EXTENSION OF  
TIME TO FILE RESPONSES TO WATKINS AND WATCHISN/LONG PETITIONS**

The United States Environmental Protection Agency (EPA) Region III (Region) respectfully requests consolidation of Permit Appeals UIC 14-63, 14-64 and 14-65 of the Underground Injection Control (UIC) permit issued on March 19, 2014 to Pennsylvania General Energy Company, LLC. As grounds for the motion, the Region states as follows:

1. On March 19, 2014, the Region issued a final permit to Pennsylvania General Energy Company, LLC (PGE) for an Underground Injection Control (UIC) Class II injection well.
2. On April 7, 2014, petitioner Suzanne Watkins filed a letter challenging the issuance of the PGE permit issuance (Permit Appeal UIC 14-63).
3. On April 8, 2014, petitioners Judy Watchisn and Stacy Long filed a petition for review of the PGE permit issuance (Permit Appeal UIC 14-64).

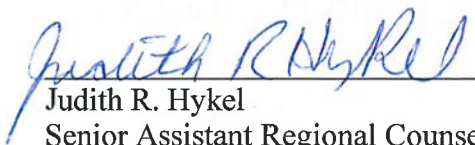
4. On April 20, 2014, petitioner William J. Woodcock III filed a petition for review of the PGE permit issuance (Permit Appeal UIC 14-65).

5. Pursuant to the regulations for appeals of UIC permits, the Region is required to file a response to the petition, along with a certified index of the administrative record, and relevant portions of the administrative record within 30 days after the filing of a petition. See 40 C.F.R. §124.19(b)(2).

6. Pursuant to the regulations for appeal, the Region's response to Petitioner Watkins appeal must be filed by May 7, 2014 the Region's response to Petitioners Watchisn and Long must be filed by May 8, 2014 and the Region's response to Petitioner Woodcock's petition must be filed by May 20, 2014. See 40 C.F.R. §124.19(b)(2).

7. In the interest of efficiency, and to avoid duplication of efforts and unnecessary expenditure of resources, the Region requests that the EAB consolidate the three permit appeals of the PGE permit, allow the Region to file one consolidated response, and grant an extension of time until May 20, 2014, which is thirty days from the date when the last petition was filed by Petitioner Woodcock, to file a consolidated response.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that I delivered a copy of the foregoing Motion to Consolidate Appeals, and for Leave to File a Consolidated Response, and for Extension of Time to file a Response to the Watkins and Watchisn/Long Petitions on the date specified below, by certified mail, return receipt requested to:

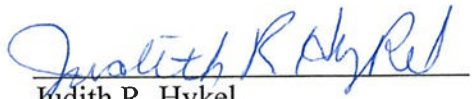
Suzanne Watkins  
723 East Run Road  
Marion Center, PA 15759

Judy and Paul Wtchisn  
1287 Sebring Road  
Marion Center, PA 15759

Stacy and Mark Long  
1900 Mumau Road  
Glenn Campbell, PA 15742

William J. Woodcock III  
Farnsworth House  
2416 East Run Road  
Grant Township  
Marion Center, PA 15759

I also certify that I filed the original electronically with the Environmental Appeals Board on the date shown below.



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Date: 4/25/14

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