



uic permit(pas2d010bven) -Stonehaven Energy injection well  
chuck davis to: Steve Platt

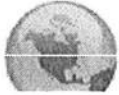
05/14/2012 10:17 AM

From: chuck davis <chuckedavis47@hotmail.com>  
To: Steve Platt/R3/USEPA/US@EPA

Steven:

Please send me further information on Stonehaven's draft permit and statement of basis. I live very close to this injection well and have a water well. I also am concerned over old gas and oil wells that were never plugged or plugged improperly. It's my intention to ask questions at the hearing on June 12 at the Seneca Fire hall.

Charles E. Davis  
624 Heckathorn Ch. Rd.  
Seneca, Pa. 16346  
chuckedavis47@hotmail.com



Stonehaven Energy Latshaw 9  
Debra Frawley to: Steve Platt

05/21/2012 02:10 PM

From: "Debra Frawley" <greenways@ficda.org>

To: Steve Platt/R3/USEPA/US@EPA

History: This message has been replied to.

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Mr. Platt,

May I have a copy of the draft permit and statement of basis, as well as any other information available concerning the Stonehaven Energy Underground Injection Control permit for their Latshaw #9? This is a Class II-D injection well to be located in the Tippery Field in Cranberry Township, Venango County, PA. Your name and email were listed as a contact for more information. Please respond via this email address or to the address listed below.

I will also be requesting that the public hearing tentatively scheduled for June 12, 2012 at the Seneca Volunteer Fire Department take place.

Thank you,

*Debra M. Frawley*

*Greenways & Open Space Coordinator*

*Council on Greenways & Trails*

*191 Howard St. Suite 215*

*Franklin, PA 16323*

*814-432-4476 Ext. 121*

*greenways@ficda.org*



**Underground Injection Control permit (PAS2D010BVEN)**  
Cranberry Township to: Steve Platt

05/22/2012 09:28 AM

From: Cranberry Township <cran@twp.comcastbiz.net>  
To: Steve Platt/R3/USEPA/US@EPA

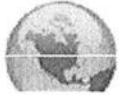
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History: This message has been replied to.

We are requesting that the EPA hold the Public Hearing scheduled for Tuesday, June 12, 2012 at 7:00PM at the Seneca Volunteer Fire Department Community Center in Seneca, PA . If you have any questions please contact me.

Thank you,  
Cranberry Township Board of Supervisors, Venango County

Frank A. Pankratz  
Secretary/Treasurer  
(814) 676-8812 ext. 104



**stonehaven Energy injection well permits**  
nsrosewine to: Steve Platt

05/24/2012 04:31 PM

From: nsrosewine@aol.com  
To: Steve Platt/R3/USEPA/US@EPA

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History: This message has been replied to.

Would you please send me the draft permit, the statement of basis and the geological review and any and all information for the injection well from permit (PAS2D010 BVEN) for Stonehaven Energy. Please mail this information to

Martin Stine  
423 Tippery Road  
Seneca, Pa 16346

Thank you in advance  
Martin Stine



**UICP Permit PAS2D010BVEN**  
Steve Spielman to: Steve Platt

05/26/2012 09:46 AM

From: "Steve Spielman" <spielman@csonline.net>

To: Steve Platt/R3/USEPA/US@EPA

History: This message has been replied to.

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Hello Stephen;

I am requesting a copy of the draft permit and statement of basis for the item in the subject line (UICP Permit PAS2D010BVEN)

Latshaw #9, Tippery Field, Cranberry TWP

I am a resident of Cranberry Twp.

Thank You.

Steven J Spielman

458 Caldwell Rd

Oil City, PA 16301

(Cranberry Twp)

(814) 676-5095



**Stonehaven Energy Tillery Field injection well: Latshaw #9**  
Bier, Charles to: Steve Platt

06/08/2012 05:29 PM

From: "Bier, Charles" <CBier@paconserve.org>

To: Steve Platt/R3/USEPA/US@EPA

History: This message has been replied to.

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Dear Mr. Platt,

Per EPA's notice regarding the project identified above, I would like to request copies of the draft permit and the statement of basis.

Thank you,

Charles W. Bier  
Sr. Director, Conservation Science  
Western Pennsylvania Conservancy  
800 Waterfront Drive  
Pittsburgh, PA 15222  
(412) 586 - 2306



**Stonehaven Energy injection well**  
Debra Frawley to: Steve Platt

05/31/2012 10:00 AM

From: "Debra Frawley" <greenways@ficda.org>  
To: Steve Platt/R3/USEPA/US@EPA

Mr. Platt,

Please accept the attached letter to add to your files concerning the Stonehaven Energy injection well draft permit (PAS2D010BVEN). A hard copy is on its way to your office. Included in this letter is a request to proceed with a public hearing on the subject tentatively scheduled for June 2012. If you have questions or need further information contact me via this email or address listed below.

*Debra M. Frawley*  
*Greenways & Open Space Coordinator*  
*Council on Greenways & Trails*  
*191 Howard St. Suite 215*  
*Franklin, PA 16323*  
*814-432-4476 Ext. 121*  
*greenways@ficda.org*



Stonehaven\_comment letter.doc

# Council on Greenways & Trails

191 Howard St. Suite 215 Franklin, PA 16323  
814-432-4476 Ext. 121, Fax: 814-432-4777

[greenways@ficda.org](mailto:greenways@ficda.org)

December 17, 2012

U.S. EPA Region III  
Stephen Platt  
Ground Water & Enforcement Branch  
Office of Drinking Water and Source Water Protection (3WP22)  
1650 Arch Street  
Philadelphia, PA 19103-2029

**Re: Stonehaven Energy Management LLC  
Proposal to issue Final Underground Injection Control Permit – PAS2D010BVEN**

Dear Mr. Platt,

The Council on Greenways & Trails is writing to ensure that information about the land area on which the above listed well is sited has been brought to the attention of the U.S. Environmental Protection Agency and other agencies involved in the permitting, construction, operation and monitoring process.

The 2009 Northwest Pennsylvania Regional Greenways Plan and the 2009 Venango County Greenways Plan both list that area as a Significant Value Natural Systems Greenway Corridor. It is recommended that these corridors be protected to preserve their ecological functions and benefits to the community. The 2010 Venango County Natural Heritage Inventory lists the area as "One of the most ecologically significant areas in Venango County containing three species of concern including a state endangered species." While jobs and commercial development are, of course, needed in the area, CGT hopes to assist to ensure minimal stress and negative impact on the sensitive environmental resources which are present.

The permit application was not made available via email or at the Oil City Public Library and so it is not known if this type of information was investigated and taken into consideration by Stonehaven Energy. Further information is listed below and available by contacting the Greenways Coordinator at the address listed on this document. CGT is requesting that a public hearing be held as tentatively scheduled for June 12, 2012.

While this permit will control and monitor what happens underground, there is much more to discuss. Consideration must be given to the placement of the well, access to the well, construction and maintenance of roads and/or pipelines and any other delivery mechanisms to the well, placement of monitoring equipment and access to these, etc.

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*Recognizing the worth of natural, heritage and recreational resources...  
planning now, enjoying forever.*



The importance of natural system greenways is to preserve natural ecosystem values and functions, sustain clean air and water, and provide a variety of benefits to people and wildlife. For the 2009 and 2010 plans an inventory of natural and ecological infrastructure resources was conducted to enable the identification of the proposed Natural Systems Greenway building blocks. The analysis lead to recommending that specific areas of Venango County's natural landscape be conserved.

The Tipperry Greenway covers the area known as Tipperry Meadows and encompasses sections of Halls Run, Wolf Branch, Tarklin Run, and Horse Creek. There is one biological diversity area associated with this corridor. Halls Run and Tarklin Run watersheds support an extensive population of a rare animal species and many wetlands within the watersheds provide potential habitat for rare plant species.

The site coordinates listed for this permit are within the Tipperry Greenway. Please take the information available in the Venango County Greenways Plan and the Venango County Natural Heritage Inventory into consideration when issuing the permit and during the monitoring process. Both documents are available via the County website under the Planning Commission Department's Services and Responsibilities tab: <http://www.co.venango.pa.us/index.php/services-and-responsibiities>.

For further information, please contact the Greenways Coordinator at [greenways@ficda.org](mailto:greenways@ficda.org) or 814-432-4476 Ext. 121. Thank you for your consideration.

Sincerely,

Debra M. Frawley  
Greenways Coordinator

Cc: Cranberry Township Supervisors

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*Recognizing the worth of natural, heritage and recreational resources...  
planning now, enjoying forever.*



requesting hearing on Stonehaven Energy's injection well  
nsrosewine to: Steve Platt

06/01/2012 12:39 PM

From: nsrosewine@aol.com  
To: Steve Platt/R3/USEPA/US@EPA

Having studying the proposal to issue a final permit for Stonehaven Energy's injection well, I have considered it carefully. My family has lived in the Tippery area and has been involved in the oil and gas industry for over 150 years. The area surrounding the proposed injection well was once owned by members of my extended family and in the early 1900's this farm and many of the surrounding properties were drilled and operated by companies that eventually became National Fuel Gas. Numerous Speechly gas and shallow oil wells were drilled and abandoned and left unplugged both on this property and on the surrounding properties. This fact is being willfully and intentionally ignored. This becomes a worrisome issue for the residences of the neighborhood who rely on water wells to provide drinking water and who enjoy the beautiful and fragile ecosystem that this area.

I believe the brine injection will flood the speechly sand depriving adjoining property owners of the use of such and demand protection from this. Economic damage will be caused drowning out the Speechly sand as brine water can only spread from its source in this porous reservoir. Any properties adjoining this injection well will eventually receive liquids from it, depriving adjacent land owners of their gas in the Speechly formation.

Having brine water put under our home by an uncaring money hungry company is why the Environmental Protection Agency was created-- to protect the people of United States. This scam is going to harm the people and the fragile ecosystem of the Tippery Area. We do not want anyone, especially Stonehaven Energy, to put an injection well in our neighborhood. For this reason I request a public hearing.

Martin Stine



request hearing Stonehaven Energy injection well  
nancy stine to: Steve Platt

06/01/2012 12:44 PM

From: nancy stine <nkstine@gmail.com>

To: Steve Platt/R3/USEPA/US@EPA

History: This message has been replied to and forwarded.

Having studying the proposal to issue a final permit for Stonehaven Energy's injection well, I have considered it carefully. My family has lived in the Tippery area and has been involved in the oil and gas industry for over 150 years. The area surrounding the proposed injection well was once owned by members of my extended family and in the early 1900's this farm and many of the surrounding properties were drilled and operated by companies that eventually became National Fuel Gas. Numerous Speechly gas and shallow oil wells were drilled and abandoned and left unplugged both on this property and on the surrounding properties. This fact is being willfully and intentionally ignored. This becomes a worrisome issue for the residences of the neighborhood who rely on water wells to provide drinking water and who enjoy the beautiful and fragile ecosystem that this area.

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Having brine water put under our home by an uncaring money hungry company is why the Environmental Protection Agency was created-- to protect the people of United States. This scam is going to harm the people and the fragile ecosystem of the Tippery Area. We do not want anyone, especially Stonehaven Energy, to put a injection well in our neighborhood. For this reason I request a public hearing.

Nancy Stine  
423 Tippery Road  
Seneca, Pa 16346



**Stonehaven Injection permit Hearing**

**chuck davis** to: newsroom.thederrick

Cc: Steve Platt

06/14/2012 03:15 PM

From: chuck davis <chuckedavis47@hotmail.com>

To: <newsroom.thederrick@gmail.com>

Cc: Steve Platt/R3/USEPA/US@EPA

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History: This message has been forwarded.

On June 12 I attended a public hearing on the proposed injection well in Cranberry township along with about seventy other residents. We heard Karen Johnson, a supervisor from the EPA state that they can't deny one oil producer the application to create an injection well and allow it for others. Hearings are to way the facts and make decisions based on the known risks. I hope we got our point across of the numerous old abandoned wells, many of witch were not properly plugged if plugged at all. In addition there is about 70 residences in or around the target area.If corrective action was taken on a brine leak the acquifier would be contaminated for years.

CFR subpart B 144.11 states that work can't begin on injection wells without a permit,but we heard that this well was run on a test basis for a month. We had no notice and I don't know if a temporary permit can be issued.

What realy troubled me was the absence of state,county and local representation. I guess they had no interest!!

Charles Davis  
624 Heckathorn Ch. Rd.  
Seneca, Pa. 16346  
814-676-8974



**Public Comment on Permit #PAS2D010BVEN**  
Howard K Reinert to: Steve Platt  
Cc: Chris Urban

06/15/2012 11:39 PM

**From:** Howard K Reinert <hreinert@tcnj.edu>  
**To:** Steve Platt/R3/USEPA/US@EPA  
**Cc:** Chris Urban <curban@state.pa.us>

Dear Mr. Platt:

Attached please find my comment regarding EPA's Underground Injection Control Program Draft Class IID Permit #PAS2D010BVEN for Stonehaven Energy Mgmt., LLC, Latshaw #9, Tippery Field, Cranberry Twp., Venango Co., PA.

Thank you for the opportunity to provide this information. If you have any further questions regarding my comments, don't hesitate to contact me.

Howard

--

Howard K. Reinert, Ph.D.  
Professor of Biology  
The College of New Jersey  
P. O. Box 7718  
Ewing, NJ 08628-0718 USA  
609 771-2474



hreinert@tcnj.edu **Public Comment PAS2D010BVEN - Reinert.pdf**



# The College of New Jersey

Department of Biology

June 15, 2012

PO Box 7718  
Ewing, NJ 08628-0718

p) 609.771.2371  
f) 609.637.5118  
e) Biology@tcnj.edu  
w) www.tcnj.edu

Mr. S. Stephen Platt  
Ground Water & Enforcement Branch (3WP22)  
U. S. Environmental Protection Agency  
1650 Arch Street  
Philadelphia, PA 19103

RE: Comment on U. S. EPA's UIC Program Draft Class IID Permit Number PAS2D010BVEN

Dear Mr. Platt:

This letter is to provide information relevant to the proposal by Stonehaven Energy Management, LLC, to construct and operate an injection well at Latshaw #9, Tippery Field, Cranberry Township, Venango County, Pennsylvania.

I am an ecologist who has been studying the behavior and occurrence of the Eastern Massasauga Rattlesnake, *Sistrurus catenatus catenatus*, in Pennsylvania since 1976. The Eastern Massasauga Rattlesnake is currently listed as an Endangered species by the Pennsylvania Fish and Boat Commission (PFBC) and as a Candidate species for listing under the federal Endangered Species Act by the United States Fish and Wildlife Service (USFWS). Recently, the United States Department of Agriculture has started an initiative to protect and improve habitat for the Eastern Massasauga in Pennsylvania through the Natural Resources Conservation Service (NRCS). The first land parcels to be included in this program are only 3 miles from the proposed injection well, and even the land parcels immediately adjacent to the proposed well are likely eligible for consideration.

In Pennsylvania the occurrence of the Massasauga has historically been restricted to following counties: Alleghany, Butler, Crawford, Lawrence, Mercer, and Venango. By 1978, I documented that the distribution of this snake had been substantially reduced with confirmed occurrences only in Butler, Mercer, and Venango Counties (Reinert and Kodrich, 1978). At that time, the species was officially listed as a state endangered species by the PFBC. Surveys in 1990 (Reinert, 1990; Reinert and Bushar, 1992) and 2005 (Jellen, 2005) found further population declines. This species is now known to exist at only four widely scattered locations in Butler and Venango Counties. One of these few remaining populations occurs within a 3 mile radius of Tippery, Cranberry Township, Venango County, Pennsylvania. The proposed injection well site is within both the former and current range of this critically imperiled species. The information I have maintained over the years indicates that Eastern Massasauga Rattlesnakes

have been reported from the immediate vicinity of the proposed Latshaw #9 well over the past 35 years to the present time. The following summary is taken from my reports to the PFBC and the Carnegie Museum of Natural History, as well as my more recent personal records and observations.

Eastern Massasauga sightings in the immediate vicinity of Latshaw and former Dunmire properties (Stonehaven Energy Management, LLC) on Heckathorne Church Road:

1978 – “Specimens have been personally observed at locations 1 and 2 on Figure 19, and we have received reliable reports of Massasaugas being killed at locations 4, 5, 6, 7, 8, and 9 [vicinity of Latshaw and Dunmire properties] within the past two years. Optimal habitat occurs over a large portion of the area and all numbered locations still have a suitable environment for the Massasauga.” (Reinert and Kodrich, 1978)

1986 – “Mrs. Dunmoyer [Dunmire] who owns the large parcel of land to the west of the Heckathorne Church reported that two were killed in this vicinity during the summer of 1986. Much of this land is under agriculture. A reasonable amount of suitable habitat exists in the untractable areas. There appears to be a slight decrease in suitable habitat since 1978. An extant population apparently still exists.” (Reinert, 1990)

2011 (summer) - Mr. Daniel Droney (resident at 592 Heckathorne Church Road) reported a Massasauga killed by a car at the bend in Heckathorne Church Road immediately north of the church (telephone conversation on May 25, 2012, D. Droney to H. K. Reinert).

2012 – Aerial photographs (Google Earth) and ground-based visual surveys (May 24, 2012) from Heckathorne Church Road indicate that the much of the vicinity of proposed injection well continues to maintain suitable habitat for the Eastern Massasauga (H. Reinert, pers. obs.).

The Eastern Massasauga Rattlesnake overwinters (hibernates) in wetlands within the groundwater table and/or surface water flows, e.g., springs (Reinert and Kodrich, 1982; Jellen, 2005). Alteration of water quality and water levels are major concerns for the continued survival of this species at the few locations in Pennsylvania where extant populations remain. Degradation of water quality and fluctuations in water levels could cause populations of Eastern Massasaugas to decline or be extirpated. It appears that the proposed injection well has the potential to cause such changes, particularly in the Tippery area where there may be numerous abandoned and unidentified oil and gas wells (testimony given by Mr. John Lendrum, at public hearing June 12, 2012, Seneca, PA).

Mr. S. Stephen Platt

June 15, 2012

Based upon the aforementioned and my concern that the proposed project has the potential to negatively impact the Eastern Massasauga Rattlesnake, I encourage the EPA to:

- 1) deny Permit Number PAS2D010BVEN, and
- 2) prohibit any activity in the Tippery region that could jeopardize water quality and water levels.

Literature Cited:

- Jeilen, B. C. 2005. The Continued Decline of the Eastern Massasauga (*Sistrurus c. catenatus*) in Pennsylvania. Western Pennsylvania Conservancy, 209 Fourth Avenue, Pittsburgh, PA 15222.
- Reinert, H.K. 1990. The Occurrence of the Massasauga Rattlesnake in Pennsylvania: A Survey of Selected Sites in Butler, Mercer and Venango Counties. Allentown College of St. Francis de Sales, Dept. of Biol. Spec. Rep. to the Carnegie Mus. of Nat. Hist., Center Valley, PA. [HKR File No. 90.03]
- Reinert, H. K. and L. M. Bushar. 1992. The massasauga rattlesnake in Pennsylvania: continuing habitat loss and population isolation. In B. Johnson and V. Menzies (eds.), Proceedings of the International Symposium and Workshop on the Conservation of the Eastern Massasauga Rattlesnake, *Sistrurus catenatus catenatus*, pp. 55-59. Metro Toronto Zoo, West Hill, Ontario.
- Reinert, H. K. and W. R. Kodrich. 1978. The Occurrence of the Massasauga in Pennsylvania. Clarion State College, Dept. of Biol. Spec. Rep. to the Pa. Fish Comm., Clarion, PA.
- Reinert, H. K. and W. R. Kodrich. 1982. Movements and habitat utilization by the massasauga, *Sistrurus catenatus catenatus*. J. Herpetol.16:162-171.

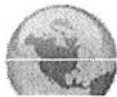
Respectfully submitted,



Howard K. Reinert, Ph.D.  
Professor of Biology

Cc: C. Urban, PFBC





permit number PAS2D010BVEN  
Jerry Brosius to: Steve Platt

06/18/2012 01:44 PM

From: Jerry Brosius <brosius21@hotmail.com>  
To: Steve Platt/R3/USEPA/US@EPA

I am Jerry Brosius an adjacent property owner to the Tippery Field where an injection well is being considered. I would offer my objection to the permitting of this well. All the homes within the influence of this proposed well get their water from either wells or springs. My home has an excellent spring water source. This is a very fragile ground water area and is subject to any changes. As stated by numerous longterm property owners at the public meeting, it is a known fact there is 150 years of drilling and lack of proper plugging. We all believe there is an excellent alternative to the injection well which is very convenient in the brine plant built a number of years ago along SR322 in Cranberry Twp.

I would offer a few questions. The first involves local property owners forwarding information on the locations of wells in the vicinity that were never plugged. If a property owner offered a location, who would pay for the plugging if the injection well was not approved? If it is the property owner's this is a discouragement for folks to offer this info.

If the permit were approved, and it lead to water problems the only viable solution would be the extension of the existing water system. This would be a major expense. Where would this money come from?

Is the use of an injection well considered environmentally favorable over the treatment of the brine at the brine plant? Would this in any way influence the decision to approve the permit?

I was surprised not to see Pa. DEP at the public meeting. I understand the explanation that they do not oversee water quality but this is much bigger than water quality. I believe they should be knowledgeable of the details of this permit request. They may be of assistance in helping the public they serve to understand the procedures and help them explore their options. The community in general has a hard time accepting that a bureaucrat from Philly is looking after their best interests. The Chesapeake Bay water basin is one of the most controlled bureaucratically in the nation. Their zeal for threatened species is tough to compete with.

Thank you for your consideration of these questions/comments



**Underground Injection Control Permit for Stonehaven Energy, Latshaw #9,  
Venango Co., Pennsylvania**

Zadnik, Andrew to: Steve Platt  
Cc: "Bier, Charles"

06/19/2012 09:33 AM

From: "Zadnik, Andrew" <AZadnik@paconserve.org>  
To: Steve Platt/R3/USEPA/US@EPA  
Cc: "Bier, Charles" <CBier@paconserve.org>

Dear Mr. Platt,

Western Pennsylvania Conservancy respectfully offers the attached comments on the proposed final underground injection control permit for Stonehaven Energy Management, LLC, Cranberry Township, Venango County, PA.

Please contact me with any questions.

Thank you,

Andrew Zadnik  
Land Stewardship Coordinator  
Western Pennsylvania Conservancy  
800 Waterfront Dr.  
Pittsburgh, PA 15222  
412-586-2318 (office)  
412-977-9681 (cell)  
412-231-1414 (fax)



azadnik@paconserve.org2012-06-19\_WPC to EPA re injection well.pdf

TO: Mr. Stephen Platt  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

FROM: Andrew Zadnik, Land Stewardship Coordinator  
Western Pennsylvania Conservancy  
800 Waterfront Drive, Pittsburgh, PA 15222  
(412) 586-2318

DATE: 19 June 2012

RE: Notice of Proposal to Issue Final Permit  
Tippery Field Injection Well Latshaw #9, Venango Co., Pennsylvania  
Stonehaven Energy Management LLC

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For your consideration in reviewing Stonehaven Energy Management LLC's Tippery Field Injection well, as a nearby landowner, Western Pennsylvania Conservancy (WPC) submits the following comments and questions regarding aspects of the proposed project.

Western Pennsylvania Conservancy

WPC is a private non-profit land trust established in 1932 and supported by more than 11,000 members. More than 232,000 acres have been protected by WPC in the western half of the state. WPC's mission includes the conservation of rare and endangered species and significant high quality wildlife habitats.

Western Pennsylvania Conservancy's Property in Cranberry Twp., Venango Co., PA

WPC owns a 55-acre property (Cornuet tract) located 1.28 air miles southwest of the proposed injection well. The proposed injection well is within the same watershed, Halls Run, as the WPC property, and is 1.6 miles upstream. Halls Run flows through the WPC tract for a distance of approximately 0.3 mile. There also are approximately 16 acres of wetlands on this tract.

This property is protected by WPC specifically to restore as habitat for the eastern massasauga rattlesnake (*Sistrurus catenatus catenatus*), which is a Candidate under the U.S. Endangered Species Act and listed as Endangered by the Pennsylvania Fish and Boat Commission. In evaluating the injection well, WPC requests that the U.S. EPA assure this property and the natural resources within it will not be damaged or altered.

Abandoned Uncapped Oil and Gas Wells in the Area of the Proposed Injection Well

WPC became aware of two inactive gas wells on the Cornuet tract when it was acquired. These wells were drilled in the 1980s. Other older oil or gas wells have been reported for this tract. We do not know whether the two inactive wells are in the Speechley Formation, and WPC does not have expertise about how injection wells function. We can only ask whether there is a risk that the injection pool might migrate into these wells and ultimately impact natural resources on the Cornuet tract. With "an expected maximum volume of 4500 barrels per month" over ten years, WPC wants assurance that the natural resources it is protecting on the Cornuet tract are

not in jeopardy, e.g. via uncapped gas wells or other sources. Additionally, given the wording of the Notice, it is unclear whether or not the expected maximum volume can be exceeded.

#### WPC Holds the Gas, Oil and Mineral Rights

The gas and mineral rights for the Cornuet tract are held by WPC. WPC is concerned that the injected waste fluids might migrate to the Speechley Formation that is part of this tract. Our staff lacks the expertise to calculate this possibility, and asks that U.S. EPA consider this issue. WPC is not interested in granting access to these resources to Stonehaven Energy Management LLC.

#### Underground Sources of Drinking Water (USDWs)

It is important to note that there is a USDW well on the WPC Cornuet tract. Again, WPC does not have the expertise to determine whether there is a risk to this well and its property.

#### Eastern Massasauga Rattlesnake Conservation

As previously mentioned, one of WPC's objectives in Venango County is to assist in the protection and management of the eastern massasauga. The need for this work is defined by the federal status and state status determined for this reptile. The proposed injection well is within one of the last remaining sites for this species in Pennsylvania. Recently documented occurrences are 2.5 miles and 3 miles from the proposed well, however, this species is difficult to locate, and closer occupied habitats might exist.

In addition to direct disturbance of habitat, because the eastern massasauga is dependent upon wetlands, any activities that impact groundwater quality also can threaten this species. In particular, this species hibernates in groundwater and will come in contact with any pollution that is introduced to the associated hydrology. Therefore, if injected waste water migrates into groundwater strata it could reach the massasauga's hibernation sites. WPC's Cornuet tract includes 16 acres of groundwater-linked wetlands.

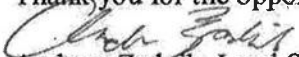
#### Venango County Natural Heritage Inventory

The Venango County Natural Heritage Inventory, published in 2010 by the Pennsylvania Natural Heritage Program, reports on rare and endangered species and important wildlife habitats. The proposed injection well site and the WPC property noted above are both within an area identified by the Inventory as Tippery Meadows Biological Diversity Area. This area is listed as one of "exceptional significance," and includes three species of concern. One of these, the eastern massasauga, has already been mentioned as a federal Candidate and state Endangered species. Because this is a wetland dependent species, the report identifies water pollution as a threat, e.g. via gas development. The other two species, coal skink (*Eumeces anthracinus*) and short-headed garter snake (*Thamnophis brachystoma*), are listed as species of High Level Concern within the Pennsylvania Wildlife Action Plan. This plan can be accessed at:

<http://fishandboat.com/promo/grants/swg/00swg.htm>, and the Venango County Natural Heritage Inventory can be found at <http://www.naturalheritage.state.pa.us/CNHI.aspx>

If there are any questions, or if you can respond to any of the issues raised, please feel free to contact me.

Thank you for the opportunity to comment.

  
Andrew Zadnik, Land Stewardship Coordinator



**Stonehaven Energy injection well**  
nsrosewine to: Steve Platt

06/19/2012 04:17 PM

From: nsrosewine@aol.com  
To: Steve Platt/R3/USEPA/US@EPA

The attachment are my objections to the injection well.

thank you



Martin Stine testimony against injection well.docx woods.jpg platt map.jpeg injection well.jpeg

I want to thank you for taking my testimony, my name is Martin Stine. My family has lived in this area since they homesteaded it and they were involved in the oil and gas industry since the very beginning. I am an investor in the oil and gas industry and have a lifetime of experience in it.

I echo all my neighbors' concerns over the proposed well design regarding isolation of the oil zones and for the potential pollution of two watersheds. I want to take this time to list my objections to the proposed injection well of Stonehaven Energy as the following.

According to the July 1939 topographic and geology survey Geology of the Oil and Gas Fields of the Hillards Quadrangles by R.E. Sherrill and L.S Matteson, the natural original gas pressure of the Speechley sand northeast of the Hilliards Quadrangle at 600 to 700 psi (page 24), Stonehaven's proposed 1250 psi effectively doubles this. Exceeding natural original pressure of the formation by doubling it seems like questionable science to me. My understanding of gas storage fields is that they never exceed original reservoir pressure.

The Speechley of this area is not played out, but just off the fair way. It is a national asset deserving protection instead of denigration. I believe the brine water injection well will "flood" the Speechley sand and depriving me and potentially others of the use of the gas on our adjoining properties and I demand protection and rights to mine. Economic damage will be caused by drowning out the Speechley sand as water/brine can only spread from its source in this porous reservoir. Any property adjoining this injection well will eventually receive liquids from it and be liquidated by it, depriving adjacent land owners of their gas in the Speechley formation.

Since the beginning of drilling by Havoc, Lynx, Ardent, Stonehaven, or whatever this core group of individuals have changed their name to avoid responsibility, prosecution, and liability; there has been a decline in the number of and variety of reptiles and amphibians on my property, an area of swamp land that in my youth used to be home to a wild variety of flora and fauna. It is a rare thing now to see frogs, Cray fish, Mississauga snakes, efts, salamanders, garden snakes, minnows, etc.... as well as other small animal that were once abundant. I

feel that Stonehaven's attention to the environment and industry standards is lacking. My property, where I had leeks (ramps) and blueberries growing, is now covered in cement and drill cutting from one of their wells that they did not completely clean up. The once vibrant lively spring run that went through our property is now a dull silted ditch. The absorbent cloth towels put down in March 2010 to clean up an "accidental" (negligent) spill are still visible in June 2012. The oil and the absorbent cloths were never removed but left to nature to clean. See attached pictures of the mess they left on our property even after the DEP had them clean it up and where our property is located in relevance to the injection well.

Geologically the porous nature of the Speechley sand combined with the undocumented unplugged well in every direction make placing an injection well on brink of two watershed and upstream from miles of ecological sensitive areas a risk that will cause problem for all. These watersheds also provide water for the neighboring towns and cities and could become contaminated from these actions.

They say that the water will be pumped into the injection well through a pipeline, but how do we know without a doubt that this water is only from the wells that are on this property and not hauled in from other wells. All the water that is injected needs tested to see what is going into this well and to be sure that it from these wells only. The Tippery Field where this proposed brine comes from needs to be defined and limited.

How am I going to be convinced that they are monitoring the injection well properly and doing what is correct for the environment? Their past record leaves many doubts especially when they do as they please. They put pipelines in across other peoples' properties without their consent and try to hide it. They dump brine water on the ground that kills trees and other plants. The neighbors are tired of watching oil companies dump brine on the ground and despoiling their downstream properties and now Stonehaven wants to pollute 1950 feet underground.

I find EPA's 1320 feet (one quarter of a mile) radius of entrust to be arbitrary and insufficient given the porosity of the zone does not provide for a

large enough margin of error to adjacent property owners. Being an adjoining property owner just downhill and downstream from this proposed injection well I propose that a ring of monitoring wells could be drilled on my property and other adjacent landowner's property at Stonehaven's expense to be monitored for volume, pressure, temperature, salinity, solids, radiological activity, etc. These wells will be for the land owner's benefit and use and only monitoring data will be provided to Stonehaven so that we can determine when the injection fluids have reached the limits of their boundary. Without monitoring wells surrounding all sides of the injection well there can be no determination where fluids migrate. John Franklin Carll, in The Geology of Oil Regions of Warren, Venango, Clarion, and Butler Counties, says:

*It is easy thing to theorize as to how the water currents might conduct themselves, but quite another to show very imperfect knowledge of the constitution of the sand-rock, and therefore cannot foresee all the contingencies dependent upon details of structure, which may arise to thwart the most shrewd and judicious calculations. (Page 265)*

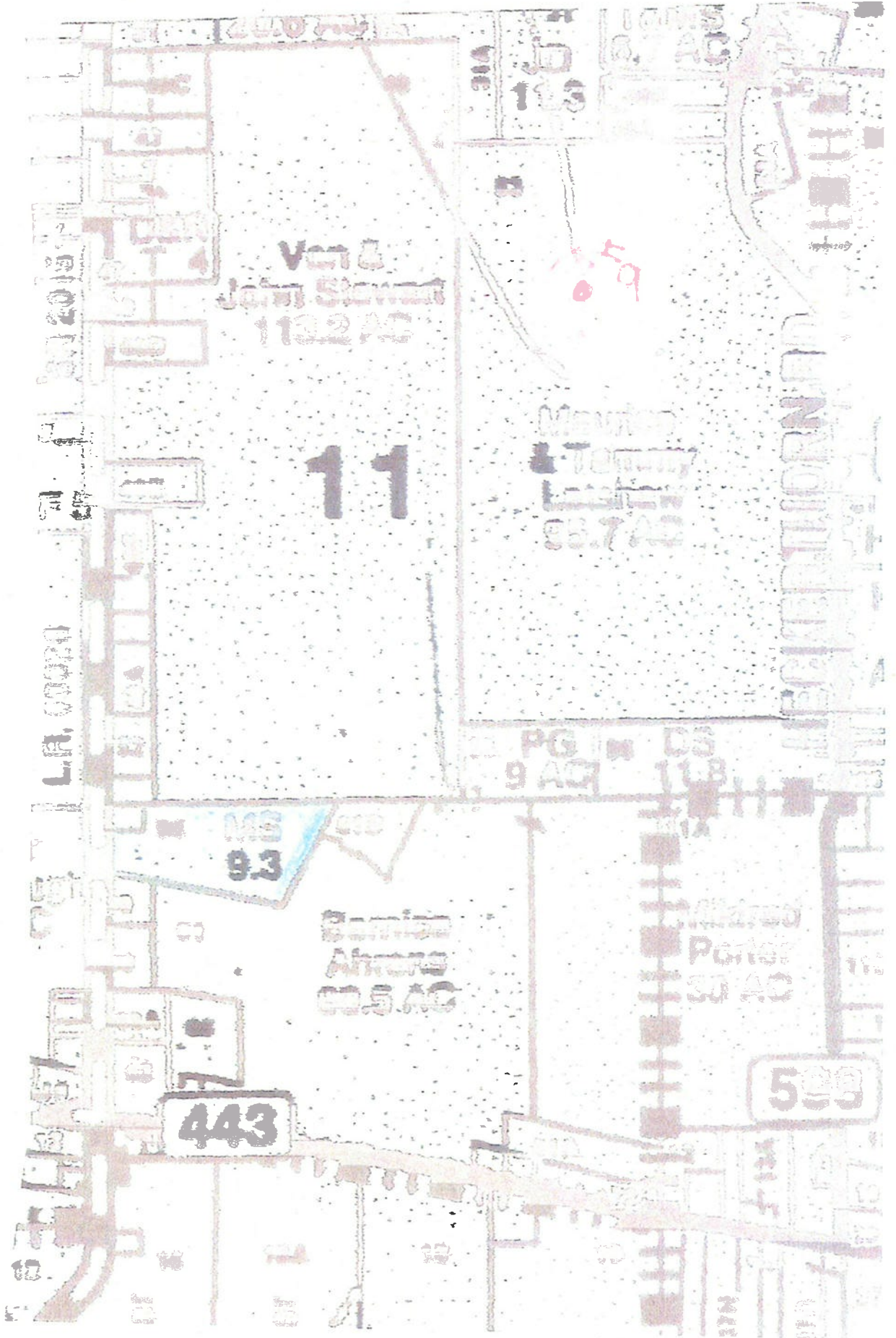
Venango County is one of the heaviest most drilled areas in the country. Long before the government kept records on the oil and gas industry, well have been abandoned here. According to "The Natural Gas Industry in Appalachia" by David A. Waples "The total (Speechley) field contained more than 1,000 wells. . . and well abandonments were frequent." (Pages 97-98) The area surrounding the proposed injection well and neighboring properties were heavily drilled in the early 1900's with most drilled between 1904 and 1915. Numerous Speechley and shallow oil well were drilled and abandoned, most were left unplugged and the ones that were plugged were on in a questionable manor. There were many way that these wells were plugged, some were plugged with trees and others were plugged with a slurry of ground lead and grease, similar to today's Neversieze<sup>tm</sup>, since it was dense and conformed to the shape of the bore. One such example blossomed out in an old women's yard near the original Speechley well about ten years ago. Understand that what comes up and out of an old well bore can be surprising and possibly inconvenient and unwanted. These unplugged and under plugged wells will let the injected brine water migrate from the Speechley sand and into the aquifers that provide the drinking water for the



neighborhood. The water then will not be fit to drink and that will cause and economic hardship to the entire neighborhood. Even if city water comes to this area, the residence will be required to pay for the hookup and the monthly bill, something we do not have to at this time.

Why can't Stonehaven just have the water treated elsewhere? I understand economic viability and the responsibility of doing it correctly, but Stonehaven should have calculated that into the cost of drilling and operating before they drilled one well. The investors of Stonehaven made a decision to develop an area that has been abandoned as uneconomical many times since oil wells were first drilled in Venango County, they should expect uneconomic results. Just because it is cheaper for Stonehaven to inject it underground is no reason to subject all their neighbors to the loss that could and will happen when the brine water migrates into other zones and under other people's property. The Tippery Gas Field is not just owned by Stonehaven Energy, but many other taxpaying citizens who oppose all that this injection well represents and will ultimately cost us both monetary and environmentally. Stonehaven Energy needs to close this questionable oil and gas field before it become more of a problem for all the neighbors and community and pay for the damage they have already caused.





Van &  
John Stewart  
1132 AC

11

Mountain  
View  
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MS  
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Sanita  
Akins  
92.5 AC

PG  
9 AC

DS  
1.8

Porter  
30 AC

443

599





**objections to Stonehaven's injection well**  
nancy stine to: Steve Platt

06/19/2012 04:27 PM

From: nancy stine <nkstine@gmail.com>  
To: Steve Platt/R3/USEPA/US@EPA

Here are my objections to Stonehaven's injection well.

Thank you



Nancy Stine testimony against injection well.docx woods.jpg platt map.jpeg injection well.jpeg

I want to thank you for taking my testimony, my name Nancy Stine. My family has lived in this area since they homesteaded it and they were involved in the oil and gas industry since the very beginning. I am an investor in the oil and gas industry and have a lifetime of experience in it.

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Revised Comments for Permit PAS2D010BVEN  
Steve Spielman to: Steve Platt

06/19/2012 05:29 PM

From: "Steve Spielman" <spielman@csonline.net>

To: Steve Platt/R3/USEPA/US@EPA

History: This message has been forwarded.

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Steven;

I was present at the Hearing for this permit and wish to revise some of my statements.

I stated that the Area of Review (AoR) should be greater than  $\frac{1}{4}$  mile due to the multitude of old wells in the area. I wish to specify that the area of review should be at least one mile.

The Statement of Basis indicates that Stonehaven Energy Mgmt submitted a UIC permit application June 30, 2011. A review of the Project file in the Pennsylvania Department of Environmental Resources (PADEP) Meadville Regional Office, Project No. ARI-B-1; reveals that an application had been submitted previously and permission was granted NLT November 2010 for Stonehaven & Ardent Resources to conduct a test for 30 days on the #9 well. The notice allows 5000 barrels to be injected and a report to be filed with Dave Rectenwald. It appears this was renewed and a report was due NLT May 15, 2011. I don't remember hearing anything about the results of the test and who monitored the test.

Several wells in the project file mentioned above have records showing that old wells were encountered during the drilling process:

Latshaw 9X has a comment on the inspection dated 3/18/10 "Old hole located while fracing Latshaw 26 (121-44494) Fluids contained on site". I'm not involved in Oil & Gas production but it seems curious that fracing would reveal an old hole unless there are

unknown/abandon wells reaching into the speechley sands nearby.

Latshaw 7X encountered an "old open hole with wood conductor as well as steel and wooden rods".

Latshaw 4X has an inspection sheet dated 1/11/10 with remarks: "Rig currently at 590 ft and currently encountering a bridge, possibly casing that has been pushed down hole. 280 ft of 5-5/8 inch casing has been removed from the well. The casing looks like Swiss cheese and contractor believed casing seat was at 345ft. Ardent to file for alternate method and plug from 590ft". A later entry 2/14/11 for Latshaw 4X, granted an alternate form of plugging at a level of 630', but the record is blank for method used.

I have attached PADEP's map of the area, there are two overlays to show the wells in the Tippery field. What I find curious about the PADEP maps is the fact that in 2008 a representative of PADEP and a Palmerton Group employee were on my property identifying old wells for Shell Oil. They found several but none of those wells are shown on the map. I am now wondering what information was provided to you at EPA in your determination that the Injection well permit should be approved.

<<...>> <<...>> <<...>>

Some or all of this information may already be known. I do not object to injection wells. I do object to an injection well in this area because of the history of drilling and lack of oversight of those wells throughout the 150 year history of drilling here. I am also concerned about what happens when such a well is approved and then the permit is modified. Stonehaven Energy Management LLC is a capital venture company formed in 2009, Their performance integrity and future

responsibility to the people of this area is questionable - at best. There is a lesson to be learned from what happened to a local government's attempt to restrict the use of an injection well in Warren county - the court ruled that they had no standing. I retired after 41 years with the Federal Government - I understand the pressures and challenges of low funding as well as the ominous threat to dismantle the EPA. You have my support and the support of every citizen I speak to.

Thank You for your time and consideration.

Steven J Spielman

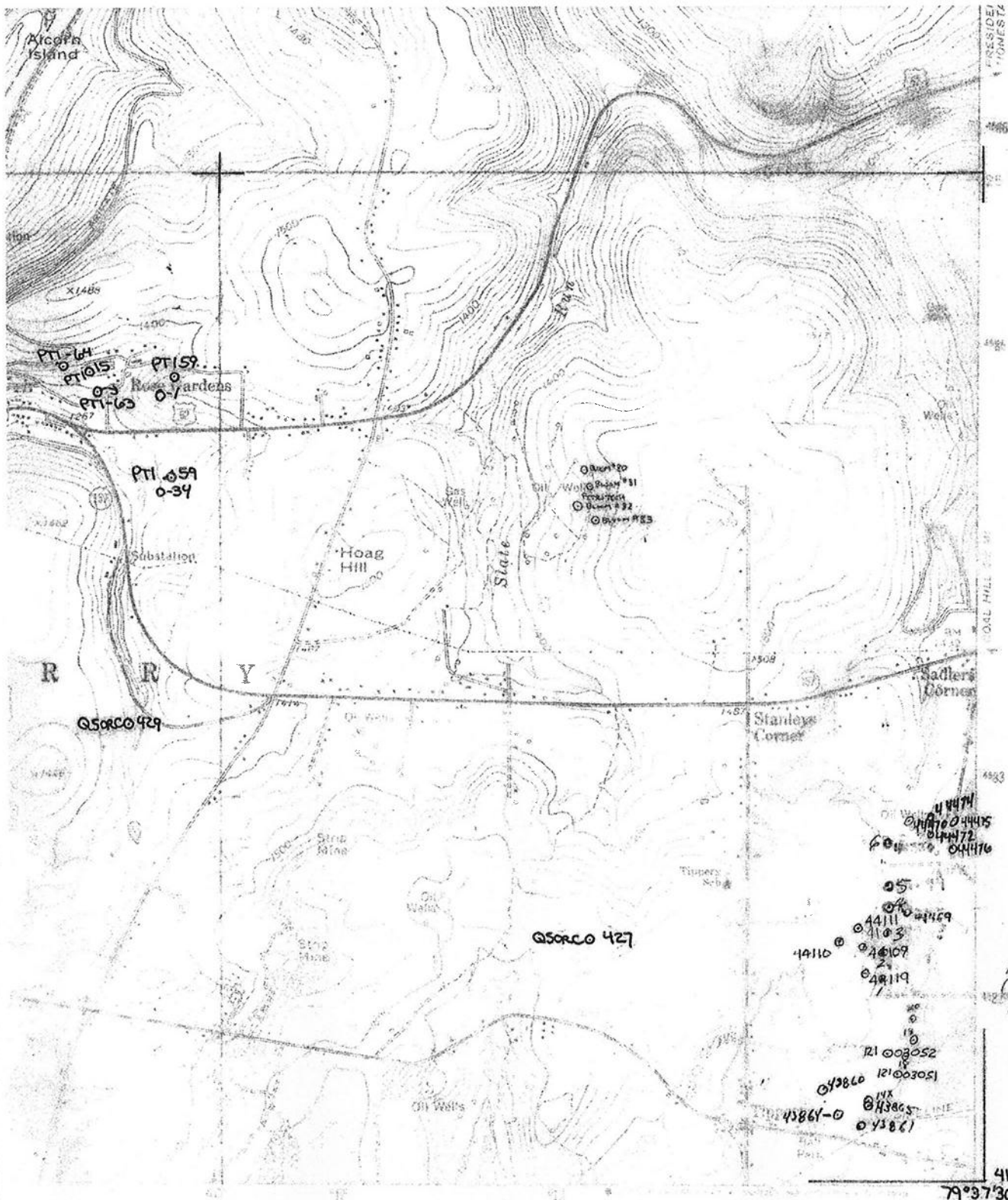
458 Caldwell Rd

Oil City PA 16301



814-676-5095 PADEP Oil City Quad.pdf PADEP Overlay B.pdf PADEP Overlay C.pdf





DERCO  
(0708)

AKI-8-1  
(1,2,3,4,5,6)  
LATSHW

ROAD CLASSIFICATION

- Heavy-duty Light-duty
- Medium-duty Unimproved dirt
- U.S. Route
- State Route

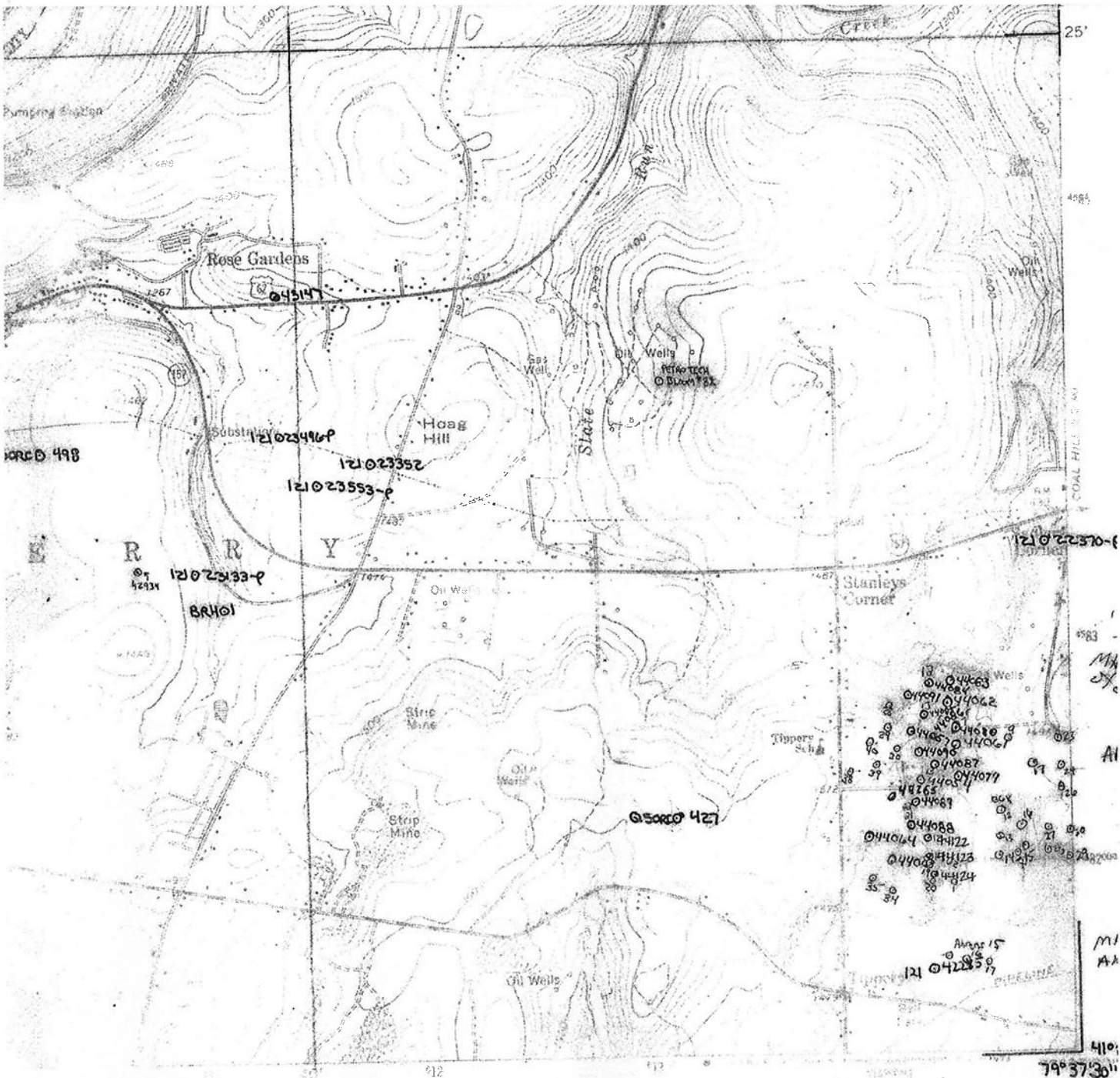


OIL CITY, PA

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DARKS





ROAD CLASSIFICATION

- Heavy duty Expressway
- Medium duty Unimproved dirt
- U.S. Road
- State Route

**OIL CITY, PA**  
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 WASHINGTON, D. C. 20242  
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