



CITY OF DUBOIS, PENNSYLVANIA

16 W. SCRIBNER AVE. • P.O. BOX 408 • DUBOIS, PENNSYLVANIA 15801

TELEPHONE: (814) 371-2000, Ext. 135
FAX: (814) 371-1290

November 23, 2014

Diane Bernardo
8 Tower Lane
DuBois, PA 15801
814-371-4210
honey0510@comcast.net

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Avenue, NW
WJC East, Room 3334
Washington, DC 20004
PHONE NUMBER - 202-233-0122

RE: Petition to Review (Appeal) Permit for Windfall Oil & Gas, Inc.
PERMIT #: PAS2D020BCLE
PERMITTED FACILITY: Class II-D injection well, Zelman #1

Dear Environmental Appeals Board:

I, Diane Bernardo, submit this letter of support asking that the permit for a deep injection well in Brady Township be denied for this proposed location. I have already participated numerous times in your public comment periods and at your public hearing.

I previously submitted geological and hydrological surveys commissioned by DuBois City Council in 1958 and the Castleberry Report of 2009 showing a fault line from Luthersburg area past Rockton/Home Camp area. These studies identify at least 47 abandoned gas wells (not City owned) with old deteriorated casings in these basins. 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. It is also questionable that a fault block exists even though the EPA Response Summary mentions fault blocks, since it isn't shown on the permit application map.

The DuBois Water Authority reservoir and newly dug water wells reside in this vicinity. Approximately 5000 customers get water from this water source. 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.

Another inaccurate statement seems to exist based on the map information showing faults in relation to the gas wells (EPA Response summary page 7, #2), which mentions plugged wells not producing outside the fault block. This is an inaccurate statement because Atkinson's property well was never plugged and has been used till more recently (may be currently listed as inactive) and is located on the permit applicant maps on the other side of a fault. Since they didn't prove we had a fault block or explain the depths of the

ENVIR. APPEALS BOARD

2014 NOV 26 AM 11:42

RECEIVED
U.S. E.P.A.

faults they might be or might not be transmissive. With no way to prove if the faults are non-transmissive or transmissive, I request the permit be denied.

It seems that many items are questionable. The EPA Form 7520-6 Underground Injection Control Permit Application states in instructions for Attachment B to, "submit a topographic map, extending one mile beyond the property boundaries." The EPA Response Summary (page 3, #6) is inaccurate in stating that the one mile topographic map was included and is on file at the library. The library still has the maps and none of them meet the EPA permit application criteria.

The lack of geological information available during the permit review period should have been addressed already. Residents requested a comprehensive monitoring plan and with all the old gas wells in the area you would think this would have been addressed

Taking any risk with so many old deep gas wells in the same formation, so near the injection zone is a risk not worth taking especially with so many inaccurate details, unknowns, private water supplies, and coal mines under the entire area. Based on just these facts presented the permit should be denied.



Diane Bernardo
DuBois City Councilwoman
2008 to present date