Suzanne Watkins April 5, 2014

723 East Run Road

Marion Center, Pa 15759

Environmental Appeals Board

U.S. Environmental Protection Agency

1200 Pennsylvania Ave. N.W.

Mail Code 1103M

Washington, DC 20460-0001

Re: Responsiveness Summary for the Issuance of an Underground Injection Control (UIC) Permit for Pennsylvania General Energy Company, LLC

Page 6 Factual Error

"9) Members of the public indicated that if other federal statutes are applicable, additional inter agency coordination may be necessary. The public was most concerned about the Eastern Hellbender Salamander." EPA's response: "The injection well site is located in the East Run Watershed. The closest stream to the injection well site, a tributary to East Run, is located approximately 1000 feet southwest of the injection well's location. A tributary to the Little Mahoning Creek is located approximately three-quarters of a mile west of the injection well's location, but because this tributary is part of a different watershed, specifically the Little Mahoning Watershed, it would not be affected by any surface spill, if one occurred, at the well site."

These statements of water courses are UNTRUE. The unnamed tributary is locally known as Mill Run, and is a direct tributary of East Run, both of which are the headwaters of Little Mahoning Creek high quality fisheries. Both of these small streams would be in dire straights should a surface spill occur at the well

site or in the transport of fluids to and/or from the site. A peek at a USGS map of Grant Township (also enclosed) will show direct flow from this unnamed tributary into East Run and then into Little Mahoning Watershed.

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"13) What prevents the injection fluid from coming back up once it's injected? Will the injecting fluids under pressure allow fluids to make its way back to the surface?"

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"14) Future gas production of the Marcellus Shale or the Utica Shale could lead to fluid flow out of the Huntersville Chert."

The highly fractured nature of the Huntersville Chert makes the standard AOR and ZEI determinations wholly inadequate. The Huntersville Chert is widely known as a poor cap rock for the underlying Oriskany Sandstone because of its brittle and highly fractured nature. The assumption that the Huntersville Chert will react to injection pressures as a homogeneous and porous formation is not valid. Oil/Gas extraction wells were designed to extract fluids under negative pressure; they were not designed to withstand the long-term positive pressures common to fluid injection wells. The casing seat cements of oil/gas wells are designed for a maximum of 350 psi and the inner casing for 1200psi. These designs are inadequate for the allowable maximum injection well surface casing pressures of 2933psi. The well was constructed in the past so there is no way to test the existing outer casings; therefore, the integrity of the entire well string CANNOT be assured. Indiana County has much Marcellus Shale gas under it but fluids leaking out from porous formations could contaminate and render it unusable. The standard AOR/ ZEI determinations should be reevaluated before any usage of the UIC well commences.

Respectfully submitted,

Suzanne Watkins