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ENVIR. APPEALS BOARD

**Raisin Charter Township**  
5525 South Occidental Hwy  
Tecumseh, MI 49286

Ph: (517) 423-3162  
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Raisintownship.com

SUPERINTENDENT  
JIM PALMER

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**TO:** CLERK of the BOARD, U.S. ENVIRONMENTAL PROTECTION AGENCY  
ENVIRONMENTAL APPEALS BOARD  
1200 PENNSYLVANIA AVENUE NW  
MAIL CODE 1103M  
WASHINGTON, D.C. 20460-0001

**FROM:** Jim Palmer, Superintendent Raisin Charter Township

**DATE:** March 29, 2016

**SUBJECT:** Savoy Energy Creque 3-20 Well, Permit No. MI-091-2D-0004, Raisin Charter Township, Lenawee County, Michigan

This Letter of Appeal is in Reference to Savoy Energy Creque 3-20 Injection Well Permit No. MI-091-2D-0004 located in Raisin Charter Township, Lenawee County, Michigan. Raisin Charter Township received a letter from United States Environmental Protection Agency Region 5 office at 77 West Jackson Boulevard, Chicago, IL 60604-3590 on March 7, 2016. This letter gave notice that a final permit for the Savoy Energy Creque 3-20 Injection Well in Raisin Charter Township, Lenawee County Michigan was issued.

The notice stated that the effective date was Feb. 25th 2016. Then the Regional office sent a correction that the date was actually April 14, 2016. (See Attached). We are appealing that all Fourteen parties who submitted written comments to EPA were not given full understanding of Underground Injection Control ("UIC") regulations and Savoy's application to the construction, control, monitoring, use, and closing of said well. The Underground Sources of Drinking Water ("USDW's") in the immediate and near area were not convincingly communicated to the concerned persons as to the ability to protect and maintain that resource available in the future!

The odorous aroma from the Brine injection waste product was never explained or mentioned that could result from forcing through pressure down the shaft of the Injection Well. The permit states that ONLY NATURAL BRINE, which is ancient seawater that is found along with petroleum in deep underground porous rock formations, or noncommercial Brine is to be forced down the injection well. It states that NO FLUID other than brine is allowed to be injected into the proposed well. The permit states that Savoy will SELF MONITOR and keep records of the activity of this Injection Well and send monthly reports to EPA and Michigan DEQ. What if a problem occurs from week to week or day to day? Who monitors that??

The River Raisin is a large water source for many folks in Southern Michigan, and it flows right by this projected site, running all the way over to one of the GREAT LAKES, LAKE ERIE. This type of concern was never directly addressed to the Fourteen Parties. USDW's of drinking water will affect those down river from this site as some of the cities and villages use the river as a water source. Any contamination of this valuable resource would have a major impact to water conditions in Michigan.

The Raisin River Watershed Council of Southeast Michigan has also attached a letter of support. (See Attached).

We are requesting a PUBLIC MEETING to BE held for the PUBLIC to be told in Truth and Understanding by Savoy Energy, the EPA, and the DEQ of Michigan. This Injection Well has to meet requirements and guide lines, but at what expense do we give away our natural GOD Created Environment to misunderstanding!

This letter is being shared with all media sources in our area and we are seeking a meeting with Savoy Energy, the EPA, and the DEQ of Michigan to help educate folks who are showing concern. On Monday March 28th 2016, a regular meeting of the Board of Trustees of Raisin Charter Township was held and was OPEN to the Public. Many residents of Raisin Charter Township attended and asked questions that only folks from the EPA, the DEQ of Michigan, and Savoy Energy can answer!

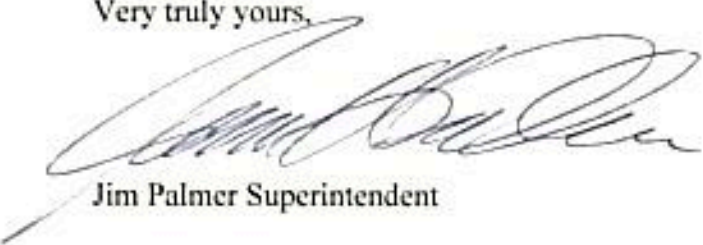
I was directed by the Raisin Charter Township Board to send this letter of Appeal to the Clerk of the Board, U.S. Environmental Appeals Board as soon as possible.

Please Except and Advise our Request and Contact me at the following:

Jim Palmer Superintendent  
Raisin Charter Township  
5525 South Occidental Hwy.  
Tecumseh, Michigan 49286

Office; 517 423-3162 ext. # 102  
Cell: 517 605-2863  
e-mail : [superintendent@raisintownship.com](mailto:superintendent@raisintownship.com)

Very truly yours,



Jim Palmer Superintendent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

Rec'd  
3-7-16

MAR 01 2016

REPLY TO THE ATTENTION OF:  
WU-16J

**CERTIFIED MAIL 7015 0640 0004 5965 0606**  
**RETURN RECEIPT REQUESTED**

Mr. Jim Palmer  
Charter Township of Raisin  
5525 Occidental Highway  
Tecumseh, Michigan 49286

**Re: Savoy Energy Creque 3-20 Well, Permit No. MI-091-2D-0004  
Lenawee County, Michigan**

Dear Mr. Palmer:

On February 25, 2016, the U.S. Environmental Protection Agency (EPA) sent you notice that it had issued a final permit for the Savoy Energy Creque 3-20 Well in Lenawee County, Michigan. That notice also included a copy of the response to comments.

By this letter, EPA is notifying you that its February 25, 2016 notice, and the first page of the final permit, included an error regarding the effective date of the permit. Those documents identified the effective date as the same date as the Water Division Director's signature on the permit – February 25, 2016. Under Title 40 of the Code of Federal Regulations § 124.15, however, the effective date is 30 days after service of the notice of the decision unless EPA establishes a later effective date.

To correct this administrative error, EPA has changed the effective date stamped on the first page of the permit. The corrected first page of the permit has been signed today, and the effective date of the permit, consistent with EPA's regulations, is April 14, 2016. EPA is providing the corrected permit to Savoy Energy, and the permit is not currently effective. This correction does not have any substantive impact on the permitted activities or permit terms.

EPA's February 25, 2016 notification accurately describes the process and timeframes available to parties who participated in the public comment period if they wish to appeal the permit decision.

The final permit and Response to Comments will be available for viewing at the Lenawee County Library (4459 West US 223, Adrian, MI), the Adrian Public Library (143 E. Maumee Street, Adrian, MI), and on EPA's website at <http://www2.epa.gov/uic/underground-injection-control-epa-region-5-il-mi-mn-oh-and-wi#public-notice>. If you have any questions, please contact William Tong at (312) 886-9380 or by email to [tong.william@epa.gov](mailto:tong.william@epa.gov).

Sincerely,



Tinka G. Hyde  
Director, Water Division

Enclosure