

EXHIBIT B-18

Notification to West Bay Exploration of EPA's Response to Comments and Final Permit

West Bay Exploration Company (WBEC), Haystead #9 SWD
(Permit #MI-079-2D-0010)

**Administrative Record
Item # 170**

April 9, 2014

Tinka G. Hyde, EPA



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

REPLY TO THE ATTENTION OF:

WU-16J

APR 09 2014

CERTIFIED MAIL 7001 0320 0005 8923 4437

RETURN RECEIPT REQUESTED

Timothy Brock
West Bay Exploration Company
13685 South West Bay Shore Drive, Suite 200
Traverse City, Michigan 49684

RE: Final Permit for the Haystead #9 SWD Well in Jackson County; U.S. Environmental Protection Agency (EPA) Permit Number MI-075-2D-0010, Michigan Department of Environmental Quality (MDEQ) Permit Number 60425

Dear Mr. Brock:

EPA received comments on EPA Draft Permit number MI-075-2D-0010 during the public comment period. EPA considered all comments, but the comments did not raise significant issues to modify EPA's determination that the permit application and draft permit meet federal Underground Injection Control (UIC) requirements. Enclosed is the signed final permit referenced above. Unless this permit decision is appealed to the Environmental Appeals Board as described below, the permit will become effective 45 days from the date that EPA signed the final permit, as stamped on Page 1 of the enclosed final permit. Provided there is no appeal, construction of the injection well will be authorized to commence on that date and in accordance with permit conditions. Please send the written notification that you have read and are familiar with conditions of the enclosed permit as required by the permit within 30 days of the receipt of this letter.

After construction of the well has been completed, you must submit EPA Form 7520-10, Completion Report for Brine Disposal, Hydrocarbon Storage or Enhanced Recovery Well, to the Permit Writer by certified mail with return receipt requested, as well as a copy of the results of the mechanical integrity test witnessed by our field inspectors, cementing records or tickets, and any other tests or logs required by the permit. Many useful forms can be found on our web site, <http://www.epa.gov/region5/water/uic/techdocs.htm>. A copy of the state completion report will also assist us in our review. We will review all information provided and the Underground Injection Control Branch Chief will notify you in writing whether the well is in compliance and injection is authorized.

In accordance with Title 40 of the Code of Federal Regulations (40 C.F.R.) § 124.19(a), any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition(s) of the final permit decision. The petition shall include a statement of the reasons supporting that review, including a demonstration that the issue(s) being raised for review were raised during the public comment period (including during any

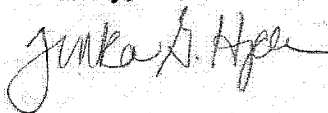
public hearing) to the extent required by 40 C.F.R. § 124.13, and when appropriate, a showing that the petition for review of the permit condition(s) in question is based on either, (1) a finding of fact or conclusion of law which is clearly erroneous, or (2) an exercise of discretion or an important policy demonstration which the Environmental Appeals Board should, in its discretion, review. If you wish to request an administrative review, you must submit such a request by regular mail to the U. S. Environmental Protection Agency, Clerk of the Environmental Appeals Board, 1200 Pennsylvania Avenue NW, Mail Code 1103M, Washington, D.C. 20460-0001. Requests sent by express mail or hand-delivered must be sent to the U. S. Environmental Protection Agency, Clerk of the Environmental Appeals Board, 1201 Constitution Ave NW, WJC East, Room 3332, Washington, D.C. 20004.

A petition for review of any condition of a UIC permit decision must be filed with the Environmental Appeals Board within 30 days after EPA serves notice of the issuance of the final permit decision. 40 C.F.R. § 124.19(a)(3). When EPA serves the notice by mail, service is deemed to be completed when the notice is placed in the mail, not when it is received. However, to compensate for the delay caused by mailing, the 30-day deadline for filing a petition is extended by three days if the final permit decision being appealed was served on the petitioner by mail. 40 C.F.R. § 124.20(d). Petitions are deemed filed when they are received by the Clerk of the Board at the address specified for the appropriate method of delivery. 40 C.F.R. § 124.19(a)(3) and 40 C.F.R. § 124.19(i). The request will be timely if received within the time period described above. For this request to be valid, it must conform to the requirements of 40 C.F.R. § 124.19. A copy of these requirements is enclosed. This request for review must be made prior to seeking judicial review of any permit decision. Additional information regarding petitions for review may be found in the Environmental Appeals Board Practice Manual (August 2013) and A Citizen's Guide to EPA's Environmental Appeals Board, both of which are available at http://yosemite.epa.gov/oa/EAB_Web_Docket.nsf/General+Information/Environmental+Appeals+Board+Guidance+Documents?OpenDocument

The Environmental Appeals Board may also decide on its own initiative to review any condition of any UIC permit. The Environmental Appeals Board must act within 30 days of the service date of notice of the Regional Administrator's action. Within a reasonable time following the filing of the petition for review, the Environmental Appeals Board shall issue an order either granting or denying the petition for review. To the extent review is denied, the conditions of the final permit decision become final agency action when a final permit decision is issued by the EPA pursuant to 40 C.F.R. § 124.19(l).

If you have any questions, please contact Tim Elkins of my staff by telephone at (312) 886-0263 or by email to elkins.timothy@epa.gov.

Sincerely,



Tinka G. Hyde
Director, Water Division

Enclosures

cc: Mark Snow, MDEQ
Sam Williams, AEM Group