ATTACHMENT 3

Subject: My comments from Sedat 4A EPA hearing (dated 8/29/2022)
Date: Tuesday, April 2, 2024 at 2:25:57 PM Eastern Daylight Time
From: Matt Kelso
To: Lisa Johnson, James Cirilano

Five years ago, hundreds of people filed into this very building to argue against converting Sedat 3A – an old production well from the 80's – into an injection well, which would pump dangerous oil and gas fluids underneath peoples' homes here in Plum Borough. Today, the same operator wants to do the same to an adjacent site – Sedat 4A – this time even closer to people's homes. The brief but troubled history of the 3A well is very much relevant to whether this second site should be approved.

We need to talk about Mechanical Integrity Tests. Let's establish some facts here.

First, according to waste data from Pennsylvania DEP, operators started taking their waste to the 3A site in February 2021.

On June 3, 2021 – less than four months later – a problem was noticed at the site.

On June 11, 2021, Senior Vice President Jacobs of Penneco wrote to David Rectenwald at EPA:

> "…As you are aware, the facility automation shut down injection operations on annular pressure threshold on the morning of June 3, 2021. The specific cause of the developed pressure pathway remains undetermined, but speculation is pointing to the threads of the 4 ½ inch *casing*."

Mr. Jacobs then goes on to say that they inserted a new 3 ½ inch packer to the depth of injection, or 1,875 feet. So basically, there is now one pipe with integrity on this converted facility, where a brand new well of this type would have three.

I had the opportunity to sit in on a call with EPA officials that discussed this event, a call that involved lawyers. When the phrase "casing failure" was used, you could almost hear them squirm over the phone.

And yet, we have the receipts for the failed Mechanical Integrity Test. Not from EPA, which stonewalled our Freedom of Information Act requests, but from the state DEP, which is also privy to this information. The failure means that there was a loss of at least 10% of pressure during a 30-minute test – a test that is only required every five years, by the way.

Why does the phrasing matter? Mechanical Integrity vs. casing failure? I'm honestly not sure – perhaps it calls for specific steps that weren't taken? What I do know is that shortly thereafter, residents started complaining of impacts to their underground sources of drinking water.

Federal regulations require that operators either repair or permanently plug the well. This is where that single 3 ½ inch pipe comes into play. In addition, the potential impact of the failure on underground sources of drinking water need to be addressed.

I'm not sure how contaminated aquifers could possibly be cleaned – I'll defer to those closest to the wells to see if their problems have been resolved or not.

But the answer certainly is not to do it all over again. Converting another decades-old well to a use that it was not engineered for, affecting these very same residents to the very same risks? That's unacceptable. EPA's draft permit for Sedat 4A is unacceptable.

Thanks,