

Name of Document: "Drinking Water: EPA Program to Protect Underground sources from Injection of Fluids Associated with Oil and Gas Production Needs Improvement." GAO-14-555: Published: June 27, 2014. Publicly Released: July 28, 2014.

Case Name: Pennsylvania General Energy Co., LLC

EAB Appeal #: UIC 14-63, UIC 14-64, UIC 14-65

Docket: PAS2DO13BIND

I, Judy Wanchisn, am requesting a motion to file the above named document with the Environmental Appeals Board for the following reasons:

- Our Petition for Review (UIC 14-64) deals with many of the issues this new report emphasizes especially permeability of porosity of the rock (poor cap rock) formations and overpressurization into this formation as detailed by the LWVPA and enviro-engineer, Dan Fisher, in our Petition for Review.
- Class II wells are the focus of this report in Pennsylvania and Kentucky as well as 6 other states.
- The nation's injection wells are often poorly regulated and experienced high rates of failure, likely leading to pollution of underground water supplies.
- Class II wells are not subject to same rigorous geological study, safety reviews, and regular monitoring.
- EPA does not require monitoring of ground water and makes it difficult for the EPA to enforce protections of UDWS.
- The EPA generally agreed with the GAO's findings and characterization of the challenges the agency is currently facing.

Respectfully submitted,


Judy Wanchisn