



UNITED ST... ES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) UNDERGROUND INJECTION CONTROL CLASS III PERMIT MINOR PERMIT MODIFICATION

Permit Number: MI-163-3G-A002

Facility Name: Sunoco Inkster Facility

Pursuant to the provisions of the Safe Drinking Water Act, as amended (42 U.S.C. 300f et seq., commonly known as the SDWA) and implementing regulations promulgated by the United States Environmental Protection Agency (USEPA) at Parts 124, 144, 146 and 147 of Title 40 of the Code of Federal Regulations (40 CFR), Sunoco Partners Marketing & Terminals L.P. of Taylor, Michigan is authorized to operate four existing wells located in a permit area limited to the W/2 of NE/4 & SW/4 & NW/4 of the NW/4 of the NW/4 of Section 7, Township 3 South, Range 10 East and the NE/4 & SE/4 of the NE/4 of the NE/4 of Section 12, Township 3 South, Range 9 East in Wayne County, Michigan. Injection shall be limited to the F, E, D, C and B units of the Salina Group between 1150 and 1800 feet, upon the express condition that the permittee meet the restrictions set forth herein. The names and locations of wells authorized under this permit and a map of the permit area are provided in Part III(D) of this permit. Additional injection wells may be constructed and operated within the permit area provided that the permittee notifies the Director prior to construction and all permit requirements are met. Injection shall not commence into any newly drilled or converted well until the operator has received authorization in accordance with Part I(E)(10) of this permit.

The purpose of the injection is limited to solution mining of salt to enlarge existing salt caverns for hydrocarbon storage.

All references to 40 CFR are to all regulations that are in effect on the date that this permit is effective.

This permit is a minor modification of an existing permit which was signed on July 6, 2005. This permit shall become effective on 14 2006 and shall remain in full force and effect during the operating life of the field, unless this permit is otherwise revoked, terminated, modified or reissued pursuant to 40 CFR 144.39, 144.40 and 144.41. This permit shall also remain in effect upon delegation of primary enforcement responsibility to the State of Michigan unless that State chooses to adopt this permit as a State permit. This permit will be reviewed at least every five (5) years from the effective date specified above.

Signed and dated:

Jo Lynn Traub

Director, Water Division

PART I GENERAL PERMIT COMPLIANCE

A. EFFECT OF PERMIT

The permittee is allowed to engage in underground injection in accordance with the conditions of this permit. The underground injection activity, otherwise authorized by this permit or rule, shall not allow the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any Primary Drinking Water Regulation found in 40 CFR Part 142 or may otherwise adversely affect the health of persons. Any underground injection activity not specifically authorized in this permit or otherwise authorized by permit or rule is prohibited. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under Section 1431 of the Safe Drinking Water Act (SDWA) or any other law governing protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 144.39, 144.40, and 144.41. The filing of a request for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

D. CONFIDENTIALITY

In accordance with 40 CFR Part 2 and Section 144.5, any information submitted to the USEPA pursuant to this permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of submission, USEPA may make the information available to the public without further notice. If a claim is asserted, the validity of the claim will be assessed in accordance with the procedures in 40 CFR Part 2 (Public Information). Claims of confidentiality for the following information will be denied:

- (1) The name and address of the permittee; and
- (2) Information which deals with the existence, absence or level of contaminants in drinking water.

E. DUTIES AND REQUIREMENTS

- Duty to Camply The permittee shall comply with all conditions
 of this permit, except to the extent and for the duration such
 noncompliance is authorized by an emergency permit pursuant
 to 40 CFR 144.34. Any permit noncompliance constitutes
 a violation of the SDWA and is grounds for enforcement action,
 permit termination, revocation and reissuance or modification.
- 2. Penalties for Violations of Permit Conditions Any person who operates this well in violation of permit conditions is subject to civil penalties, fines, and other enforcement action under the SDWA and may be subject to such actions under the Resource Conservation and Recovery Act. Any person who willfully violates a permit condition may be subject to criminal prosecution.
- 3. Need to Halt or Reduce Activity not a Defense It shall not be a defense for a permittee in an enforcement action to state that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 4. <u>Duty to Mitigate</u> The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
- 5. Proper Operation and Maintenance The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.
- 6. Duty to Provide Information The permittee shall furnish to the Director, within thirty (30) days, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required by this permit to be retained.

- 7. <u>Inspection and Entry</u> The permittee shall allow the Director or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
 - (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions of this permit;
 - (b) Have access to and copy at reasonable times any records that must be retained under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the SDWA, any substances or parameters at any facilities, equipment or operations regulated or required under this permit.

8. Records

- (a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all records required by this permit for a period of at least three (3) years from the date of the sample, measurement or report. The permittee shall also maintain records of all data required to complete this permit application and any supplemental information submitted under 40 CFR 144.31 and 144.51. These periods may be extended by request of the Director at any time by written notice to the permittee.
- (b) The permittee shall retain records concerning the nature and composition of all injected fluids until three (3) years after the completion of plugging and abandonment in accordance with the plugging and abandonment plan, contained in Part III(B) of this permit. The owner or operator shall continue to retain the records after the three (3) year retention period unless he delivers the records to the Regional Administrator or obtains written approval from the Regional Administrator to discard the records.
- (c) Records of monitoring information shall include:
 - (i) The date, exact place, and the time of sampling or measurements;

- (ii) The name(s) of the individual(s) who performed the sampling or measurements;
- (iii) A precise description of both sampling methodology and the handling of samples;
- (iv) The date(s) analyses were performed;
- (v) The name(s) of the individual(s) who performed the analyses;
- (vi) The analytical techniques or methods used; and
- (vii) The results of such analyses.

9. Notification Requirements

- (a) Planned Changes The permittee shall notify and obtain the Director's approval at least thirty (30) days prior to any planned physical alterations or additions to the permitted facility or changes in the injection fluids. Within ten (10) days prior to injection, an analysis of new injection fluids shall be submitted to the Director in accordance with Parts II(B)(2) and II(B)(3) of this permit.
- (b) <u>Anticipated Noncompliance</u> The permittee shall give at least thirty (30) days advance notice to the Director for his/her approval of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- (c) Transfer of Permits This permit is not transferrable to any person except after notice is sent to the Director at least thirty (30) days prior to transfer and the requirements of 40 CFR §144.38 have been met. The Director may require modification or revocation of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the SDWA.
- (d) <u>Compliance Schedules</u> Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted to the Director no later than thirty (30) days following each schedule date.

(e) Twenty-Four (24) Hour Reporting

(i) The permittee shall report to the Director any noncompliance which may endanger health or the

environment. This information shall be provided orally within twenty-four (24) hours from the time the permittee becomes aware of the circumstances and shall include the following information:

- (a) Any monitoring or other information which indicates that any contaminant may cause an endangerment to an underground source of drinking water; or
- (b) Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.
- (ii) A written submission shall also be provided as soon as possible but no later than five (5) days from the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- (f) Other Noncompliance All other instances of noncompliance shall also be reported by the permittee in accordance with Part I(E)(9)(e)(i) and (ii) of this permit.
- (g) Other Information If or when the permittee becomes aware that the permittee failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the permittee shall promptly submit such facts or corrected information in accordance with 40 CFR 144.51(1)(8).
- (h) Report on Permit Review Within thirty (30) days of receipt of the final issued permit, the permittee shall report to the Director that the permittee has read and is personally familiar with all terms and conditions of this permit.
- 10. <u>Commencing Injection</u> The permittee shall not commence injection into any newly drilled or converted well until:
 - (a) Formation data and injection fluid analysis have been submitted in accordance with Part II(A)(5) and II(B)(2)(c), respectively;

- (b) A report on any logs and tests required under Part II(A)(4) of this permit has been submitted;
- (c) Mechanical integrity of the well has been demonstrated in accordance with Part I(E)(18);
- (d) Any required corrective action has been performed in accordance with Parts I(E)(17) and III(C); and
- (e) Construction is complete and the permittee has submitted to the Director, by certified mail with return receipt requested, a notice of completion of construction using EPA Form 7520-10, a plugging and abandonment plan, a copy of the State permit and either:
 - (i) The Director has inspected or otherwise reviewed the new injection well and finds it is in compliance with the conditions of the permit; or
 - (ii) The permittee has not received, within thirteen (13) days of the date of the Director's receipt of the report required above, notice from the Director of his or her intent to inspect or otherwise review the new injection well, in which case prior inspection or review is waived and the permittee may commence injection.
- 11. <u>Signatory Requirements</u> All reports or other information requested by the Director shall be signed and certified according to 40 CFR 144.32.
- 12. Notice of Plugging and Abandonment The permittee shall notify the Director at least forty-five (45) working days before conversion or abandonment of the injection well.
- 13. Plugging and Abandonment The permittee shall plug and abandon the well as provided in the plugging and abandonment plan contained in Part III(B) of this permit. Within sixty (60) working days after plugging a well, or at the time of the next quarterly report (whichever is later), the permittee shall submit a report to the Director. The report shall be certified as accurate by the person who performed the plugging operation and shall consist of either:
- (a) A statement that the well was plugged in accordance with the plan previously submitted to the Director; or
- (b) If the actual plugging differed from the approved plan, a statement defining the actual plugging and explaining why the Director should approve such deviation. Any deviation from a previously approved plan which may endanger underground sources of drinking water is cause for the Director to require the operator

to replug the well.

- 14. <u>Inactive Wells</u> After cessation of injection for two (2) years the permittee shall plug and abandon a well in accordance with the plan and 40 CFR 144.52 (a) (6) unless the permittee has:
- (a) Provided notice to the Director; and
- (b) Described actions or procedures, which are deemed satisfactory by the Director, that the permittee will take to ensure that the well will not endanger underground sources of drinking water during the period of temporary abandonment. These actions and procedures shall include compliance with the technical requirements applicable to active injection wells unless waived, in writing, by the Director.
- Financial Responsibility The permittee shall maintain financial 15. responsibility and resources to plug and abandon the underground injection well in accordance with 40 CFR 144.52(a)(7) as provided in Attachment R of the administrative record corresponding to this permit action which is hereby incorporated by reference as if it appeared fully set forth herein. The permittee shall not substitute an alternative demonstration of financial responsibility from that which the Director has approved unless the permittee has previously submitted evidence of that alternative demonstration to the Director and the Director has notified the permittee in writing that the alternative demonstration of financial responsibility is acceptable. The financial responsibility mechanism shall be updated periodically, upon request of the Director, except when Financial Statement Coverage is used as the financial mechanism; this coverage must be updated on an annual basis.

16. <u>Insolvency</u>

- (a) In the event of the bankruptcy of the trustee or issuing institution of the financial mechanism, or a suspension or revocation of the authority of the trustee institution to act as trustee or the institution issuing the financial mechanism to issue such an instrument, the permittee must submit an alternative demonstration of financial responsibility acceptable to the Director within sixty (60) days after such event. Failure to do so will result in the termination of this permit pursuant to 40 CFR 144.40(a)(1).
- (b) An owner or operator must also notify the Director by certified mail of the commencement of voluntary or involuntary proceedings under Title 11 (Bankruptcy), U.S. Code, naming the owner or operator as debtor, within ten (10) business days after the commencement of the proceeding. A guarantor of a corporate guarantee must make such a notification if he or she is named as debtor, as required under the terms of the guarantee.

17. Corrective Action

The permittee shall shut-in the injection well whenever the permittee or USEPA determines that operation thereof may be causing upward fluid migration through the well bore of any improperly plugged or unplugged well in the area of review and shall take such steps as the permittee can to properly plug the offending well(s). Any operation of the well which may cause upward fluid migration from an improperly plugged or unplugged well will be considered a violation of this permit. If the permittee or USEPA determines that the permitted well is not in compliance with 40 CFR 146.8, the permittee will immediately shutin the well until such time as appropriate repairs can be effected and written approval to resume injection is given by the Director. In addition, the permittee shall not commence injection until any and all corrective action has been taken in accordance with any plan contained in Part III(C) of this permit and the requirements in Part I(E)(10) of this permit have been met.

- 18. Mechanical Integrity (MI) The permittee must establish and shall maintain mechanical integrity of this well in accordance with 40 CFR 146.8. The mechanical integrity demonstration consists of two parts: Part I demonstrates no significant leaks in the casing, tubing, or packer and Part II demonstrates no significant fluid movement into an underground source of drinking water (USDW) through vertical channels adjacent to the wellbore. The permittee is required to pass both parts of the mechanical integrity demonstration in accordance with Part I(E)(18)(a) and (b) of this permit and thereafter once every sixty (60) months from the date of the last approved demonstration.
 - (a) Pursuant to 40 CFR 146.8(a)(1), prior to commencing injection into any newly drilled well, the permittee shall demonstrate the first part of MI by using the standard annulus pressure test or another approved method.
 - (b) Pursuant to 40 CFR 146.8(a) (2), prior to commencing injection, the permittee shall demonstrate the second part of MI by running a noise, temperature or oxygen activation log. A descriptive report interpreting the results of such logs and tests shall be prepared by a knowledgeable log analyst and submitted to the Director. However, should the nature of the casing preclude the use of a noise, temperature or oxygen activation log, then pursuant to 40 CFR 146.8(c)(3), cementing records may be used to demonstrate the presence of adequate cement to prevent fluid migration behind the outermost casing and the wellbore.
 - (c) The permittee shall cause all gauges used in mechanical integrity demonstrations to be calibrated to an accuracy of not less than one-half percent (0.5%) of full scale. A copy of the calibration certificate shall be submitted to the Director or his/her representative at the time of

demonstration.

- (d) The permittee shall cease injection in a well if a loss of mechanical integrity occurs or is discovered during a test, or a loss of mechanical integrity as defined by 40 CFR 146.8 becomes evident during operation. Operation of the well shall not resume until the Director gives approval to recommence.
- (e) The permittee shall notify the Director of the loss of mechanical integrity in accordance with the reporting procedures in Part I (E)(9)(e) and II (B)(3)(b) of this permit.
- (f) The permittee shall report the results of a satisfactory mechanical integrity demonstration as provided in Part II (B)(3)(b) of this permit.
- 19. Restriction on Injected Substances The permittee shall be restricted to the injection of fresh water from the Municipality or from water wells on-site. No fluids other than those from sources noted in the administrative record and approved by the Director shall be injected. Each year, the permittee shall submit, a certified statement attesting to compliance with this requirement.
- 20. Construction, conversion, operation and plugging & abandonment within the permit area The permittee may construct, operate, convert, or plug and abandon wells within the permit area, provided that all permit conditions are met and:
 - (a) The permittee notifies the Director at such times as specified in the permit, and,
 - (b) Any additional wells are:
 - (i) Described and identified by location;
 - (ii) Located within the same well field, facility site, reservoir project, or similar unit in the same State, and injecting in the same formation; and,
 - (iii) Operated by the permittee.

PART II

WELL SPECIFIC CONDITIONS FOR UNDERGROUND INJECTION CONTROL PERMITS

A. CONSTRUCTION REQUIREMENTS

- Siting Notwithstanding any other provision of this permit, the injection well shall inject only into a formation which is separated from any USDW by a confining zone that is free of known open faults or fractures within the area of the review.
- 2. Casing and Cementing Injection wells shall be cased and cemented to prevent the movement of fluids into or between underground sources of drinking water. The casing and cement used in the construction of the well shall be as contained in Attachments L and M of the administrative record corresponding to this permit action which are hereby incorporated by reference as if they appeared fully set forth herein.
- 3. <u>Wellhead Specifications</u> A female coupling and valve shall be installed at the wellhead to be used for independent injection pressure readings.
- 4. Logs and Tests Upon approval of the surface casing and cementation records by the Director, any logs and tests noted in Part III of this permit shall be performed, unless already provided. Prior to commencement of injection, the permittee shall submit to the Director for approval a descriptive report prepared by a knowledgeable log analyst interpreting the results of those logs and tests, along with the notice of completion required in Part I(E)(10) of this permit.
- 5. Formation Data If not already provided, the permittee shall determine or calculate the following information concerning the injection formation and submit it to the Director for review and approval, prior to operation:
 - (a) Formation fluid pressure;
 - (b) Fracture pressure; and,
 - (c) Physical and chemical characteristics of the formation fluids
- 6. <u>Prohibition of Unauthorized Injection</u> Any underground injection, except as authorized by permit or rule issued under the UIC program, is prohibited. The construction, including drilling, of any well required to have a permit is prohibited until a permit has been issued and is effective.

B. OPERATING, MONITORING AND REPORTING REQUIREMENTS

1. Operating Requirements

Beginning on the effective date of this permit, the permittee is authorized to operate the injection well, subject to the limitations and monitoring requirements set forth herein. Except during stimulation, injection pressure at the wellhead shall not exceed a maximum which shall be calculated so as to assure that the pressure in the injection zone during injection does not initiate new fractures or propagate existing fractures in the injection zone. In no case shall injection pressure initiate fractures in the confining zone or cause the movement of injection or formation fluids into an underground source of drinking water. The injection pressure and injected fluid shall be limited and monitored as specified in Parts I(E)(19) and III(A) of this permit.

2. Monitoring Requirements

- (a) Samples and measurements taken for the purpose of monitoring as required in Part II(B)(3) shall be representative of the monitored activity. Grab samples shall be used to obtain a representative sample of the fluid to be analyzed. Part III(A) of this permit describes the sampling location and required parameters for injection fluid analysis. The permittee shall identify the types of tests and methods used to generate the monitoring data. The monitoring program shall conform to the one described in Part III(A) of this permit.
- (b) <u>Analytical Methods</u> Monitoring of the nature of injected fluids shall comply with applicable analytical methods cited and described in Table I of 40 CFR Section 136.3 or in Appendix III of 40 CFR Part 261 or by other methods that have been approved by the Director.
- (c) Injection Fluid Analysis The nature of the injection fluids shall be monitored as specified in Part III(A) of this permit. An initial analysis of the injection fluid is contained in Attachment H of the administrative record corresponding to this permit action which is hereby incorporated by reference as if it appeared fully set forth herein. Whenever the injection fluid is modified to the extent that the analysis required by 40 CFR 146.34(a)(7)(iii) is incorrect or incomplete a new analysis shall be provided to the Director at the time of the next quarterly report. The Director may, by written notice, require the permittee to sample and analyze the injection fluid at any time.
 - (d) <u>Injection Pressure and Cumulative Volume</u> The injection pressure shall be monitored semi-monthly and shall be reported quarterly as

specified in Part III(A) of this permit. The injected and produced fluid volumes shall be monitored daily and shall be reported quarterly. All gauges used in monitoring shall be calibrated according to Part I E(18) (c) of this permit.

3. <u>Reporting Requirements</u> - Copies of the monitoring results and all other reports shall be submitted to the Director at the following address:

U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
Attn: UIC Branch, Direct Implementation Section (WU-16J)

- (a) Quarterly Reports The permittee shall submit the results of the injection fluid analyses specified in permit conditions in Part (II) (B) (2) (c) and in Attachment A no later than the 10th day of the month following the end of the reporting period. Monitoring results shall be recorded on a form which has been signed and certified according to 40 CFR 144.32. Forms shall be submitted at the end of each quarter and shall be postmarked no later than the 10th day of the month following the reporting period. The first report shall be sent no later than the 10th day of the month following the quarter in which injection commences. This report shall include monthly average, maximum and minimum values for injection pressure, injected and produced volumes and the specific gravity of the injected fluids.
- b) Reports on Well Tests, Workovers, and Plugging and Abandonment The applicant shall provide the Director with the following
 reports and test results within sixty (60) days of completion of
 the activity:
 - (i) Mechanical integrity tests, except tests which the well fails, in which case twenty-four (24) hour reporting under Part I(9)(e) is applicable;
 - (ii) Logging or other test data;
 - (iii) Well workovers (using EPA Form 7520-12); and
 - (iv) Plugging and abandonment.

PART III SPECIAL CONDITIONS

These special conditions include, but are not limited to, plans for maintaining correct operating procedures, monitoring conditions and reporting, as required by 40 CFR Parts 144 and 146. These plans are described in detail in the permittee's application for a permit, and the permittee is required to adhere to these plans as approved by the Director, as follows:

- A. OPERATING, MONITORING AND REPORTING REQUIREMENTS (ATTACHED)
- B. PLUGGING AND ABANDONMENT PLAN (ATTACHED)
- C. CORRECTIVE ACTION PLAN (ATTACHED)
- D. ADDITIONAL REQUIREMENTS (IF REQUIRED)

OPERATING, MONITORING AND REPORTING REQUIREMENTS

LIMITATION

MINIMUM MONITORING REQUIREMENTS MINIMUM
REPORTING
REQUIREMENTS

Characteristic

FreqType

*Injection Pressure 382 psig (MAXIMUM)	semi-monthly	quarterly
Cumulative Injected Volume	daily	quarterly
Cumulative Produced Volume	daily	quarterly
Specific Gravity	monthly grab	quarterly
**Chemical Composition of Injected Fluid	quarterly grab	quarterly

SAMPLING LOCATION: wellhead

*The limitation on wellhead pressure serves to prevent injection formation fracturing. The maximum wellhead pressure is dependent upon injection formation fracture gradient, depth and specific gravity of the injected fluid. This limitation was calculated using the following formula: [{0.8 psi/ft - 0.433 psi/ft) (specific gravity)} x depth] - 14.7 psi]. The F member of the Salina formation at 1150 feet was used as the depth, a specific gravity of 1.05 was used for the injected fluid and a fracture gradient of 0.8 psi/ft was determined from a default value for Michigan.

**Chemical composition analysis shall include, but not be limited to, the following: Sodium, Calcium, Magnesium, Total Iron, Chloride, Sulfate, Carbonate, Bicarbonate, Sulfide, Total Dissolved Solids, pH, Resistivity (ohm-meters @ 75°F).

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LPG Stora	ge #4					7155 Inkster F	Rd		**		
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Locate W	ell and Outline t	Jnit on	Michigar	1	Wayne				STATE PE	0404	WBER
Section P	Plat - 640 Acres		SURFACE L	OCATION DESC	RIPTION				-	.0101	
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Size	Wt (lb/ft) TBG/CSG	Original Amount (CSG)	T	be Left in Well	Hole Size	Sacks Cement Used	Туре	OF CEMEN			EIVI
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Measured Top Depth to Botton				1565'	1565'				<u> </u>		
Sacks of Ceme	nt to be Used				770				1		
Slurry Volume t Slurry Weight (i	b be Used (cu. Ft.)				908 15.6				1		
Type of Cemen	t, Spacer or Other Ma	aterial Used		Bridge Plug	Class A				 		
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and the ar management	ge Plug at 1565'										
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Cement			\$ -		Cast Iron Bride	NG AND ABAI	MDONMENT		\$		2,800
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					CERTIFICA	ATION					20,002
	I certify under t	the penalty of law	that I have	examined a	and am familiar	with the informati	on submitted in	this document	and		
	all attachments	and that, based	on my inqu	uiry of those	individuals imm	ediately responsi	ble for obtaining	the information	n.		
	false information	ne information is to on, including the p	rue, accur ossibility /	ate, and com of fine and im	piete. I am awa prisonmed 2/D	ef & CFR 144 2	significant pena	alties for submit	tting		
.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		, moduling the p	- colointy (, inclination (it	X 144.3	-/	Secretary of process		A CONTRACTOR OF THE PARTY OF TH	
Dave Just	FFICIAL TITLE tin Vice Pres	ident		SIGNATURE	6/1		••		DATESIC	ONED 12004	
	m 7520-14				may for				11211	2004	

ORIGINAL WELL CONSTRUCTION I	DURING OPERATION	PLUGGING AND AL	JONMENT CONSTRUCTION
LPG #4			j
LFG#4			
	Curtons		
	Surface		Surface
		Top Plug Interval	IXX IXXX
		XX	XXXXX
Top of cement 0	XXX		XXXXX
	NAN I	XXX	XXXXX
	XXX Surface Casing		Surface Casing
	X X 16" @ 240	XXX	240
	XX	*USDW Base Plug	USDW Base
			240
Top of cement		*Intermediate Cut/Rip	XXXX
		Point Plug Interval	*Intermediate Cut/Rip Depth
	$\widehat{\mathbf{x}}[\widehat{\mathbf{x}}]$		$\times \times $
	XX	KK	XXXX
	Intermediate Csg.		*Intermediate Csg.
	X		
	X	*Middle Plug Interval	XXX
 	I		XXX
	$\langle \cdot \rangle$	[2	$\{X \times [S]\}$
	X	*Long String Cut/Rip	*Long String Csg
Top of Cement	\searrow	Point Plug Interval	Cut/Rip Depth
o VX	Packer Depth		XXX
	None	l 🖒	经 交换
	7)	Bottom Plug Depth	Long String Csg.
Perforations X	Long String Csg.	1565-0	1565
	10 3/4@ 1565	*Mechanical Plug Depth	
Hole Size	* Depth	1565'	Depth
Cavern	1743		1743
** Add Any Additional Information		** Add Any Additional Information	
* May not Apply		* May not Apply	
LIST OF ALL ODEN AND/OD	DEDECDATED INTERVALO	AND INTEDICAL OVALUES.	240140 1441 15514
LIST OF ALL OPEN AND/OR Specify Open Hote/ Perforations/ Varied Casing	From	To	Formation Name
Open Hole	1570	1743	B- Salt
	*		
	-		

			UNITE			AL PROTECTION	N AGENC			
			DLU		ASHINGTON, D		T DI ANI			
						DONMEN.				
WELL NAM	E & NUMBER,	FIELD NAME, LE	ASE NAM	ME & NUMBI	ER	I .		NUMBER OF O		ERATOR
LPG Stora	ao #5					Sunoco Partners Marketing and Terminals LLp				1
LFG Stora	ge #5					7155 Inkster F	18,880			
						Taylor Michiga				
			STATE		COUNTY	313-292-9822			STATE PERMIT	NUMBER
Locate W	ell and Outline I	Unit on	Michiga	n	Wayne				2152	255
Section F	Plat - 640 Acres		SURFACE I	OCATION DESC	RIPTION				<u> </u>	
	N		_NW_ 1	/4 of _NW_	1/4 of _NW 1	4 of Section_7	7Township	p_3S Range	_10E_	
0			LOCATE WI	ELL IN TWO DIR	ECTIONS FROM NE	AREST LINES OF QU	JARTER SECTION	AND DRILLING UNIT		
tt			Location	440	ft. From (N/S)	North Line	of Quarter Sec	tion		Ì
 			And		ft. From (E/W)		of Quarter Sec			ļ
	_		TVD	E OF AUT	ORIZATION) MELL			
			111	_			WELL	☐ Class I		ĺ
 		++++		∐ Individu	ai Permit		ACTIVITY	Haza	rdous Jazardous	1
				✓ Rule					azardous	Į.
	1 1		l	Area Per	mit		1	Class II	Diemasal)
T			1	_ nord				-	Disposal ocarbon Stora	1
}							1	2000 CO. C.	nced Recover	
			Number	of Wells in A	rea Permit			Class III	icea Recover	y
	150 20 E-50.00000.		I IS EDA	Permit Num	hor		İ			1
			103 21 7	- CHIRCHUIT	Dei		<u> </u>	Class IV		
	CASING/TUB	ING/CEMENT F	RECORD	AFTER PL	UGGING AND	ABANDONM	ENT	METHOD OF	EMPLACE	EMENT
Size	Wt (Ib/ft) TBG/CSG	Original Amount (CSG)	CSG to	be Left in Well	Hole Size	Sacks Cement Used	Тура	OF CEMENT	PLUGS	
16"	55	240	240		20"	600	Class A	✓ Balance Method		
10 3/4"	32.75	1540	1540		13 3/4"	800	Class A	Dum	np Bailer Met	hod
			<u> </u>					Two	Plug Method	i [
	<u> </u>			,				Oth	er	
		D ABANDON D	ATA	Plug #	Plug #	Plug #	Plug#	Plug #	Plug #	Plug #
Calculated Top		All be Placed (Inches)		10.19	10 1/5		 			
Measured Top	of Plug (ft.)				0	\		 		
Depth to Botton Sacks of Ceme				1530'	1530					
	to be Used (cu. Fl.)	····		 	730 861	 	 			
Slurry Weight (I				 	15.6			- 		
	t, Spacer or Other Ma	aterial Used		Bridge Plug	Class A					
Type of Preflus	h Used			ECCUPTI	Fresh	GING PROCE	NIDE -	1		
1. Pull Tubi	na		L	JESCKIP II	ON OF PLUG	GING PROCEI	JUKE			1
	ge Plug at 1530'									
	Si	nd spot 730 sxs C	lace A co	ment in 500!	stages from 153	אַר מי				
		w grade and weld								1
		and EPA Plugging		ar steer plate	. Weld MIDEQ#	on cap				
o. i repaie	and me MDEQ 2	and LEA Flugging	nepolis.							
										}
			ESTIMA	ATED COS	T OF PLUGG	NG AND ABAI	NONMENT			
Cement			\$ -		Cast Iron Bride		TO MINICIAI		\$ -	2,800
Logging			\$ -	(Cement Retain	ner			\$ -	2,000
Rig or Pulli	ng Unit		\$ -	5,700	Miscellaneous				\$ -	8,612
			\$ -		Total CERTIFICA	TION			\$ -	28,827
	I applie		15 -1 -1				120 12000 house	5202 (S) 17000	2	
	all attachments	the penalty of law and that, based o	that I have	e examined a	and am familiar i Individuals imm	with the informati	on submitted in	this document a	ind	j
	I believe that th	ne information is t	rue, accur	ate, and com	plete. I am awa	are that there are	sianificant nen	y uie iriiormation alties for submitt	ina	l
	false information	on, including the p	ossibility o	of fine and im	prisonment.	ef 40 CFR 144.3	2)	and the deprine		
NAME AND OF	FFICIAL TITLE			SIGNATURE	1	<u> </u>			Inare see	
Dave Just		ident		JIGHATURE //	1/1/				7/27/200	
				1 (8	160 AV 1			endon le reconstituent en la company de la c	1.21/200	

	akata bermatan na bahili ya asaka Asase ne maljen inging	et anno er era lande tradicilia etterlik adelektar fi	WI-10	3-3G-A002 B-4 of 8
ORIGINAL WELL CONSTRUCTION DU	URING OPERATION	PLUGGING AND ABA		
LPG#5				
	Surface			Surface
		Top Plug Interval	XXXXX	
Top of cement			KKKI KX	
		XXX		
	XX Surface Casing	XXX		Surface Casing
	16" @ 240			240
		*USDW Base Plug	XXXX	USDW Base
			XXXX	240
		$ \hat{x} _{\lambda}$		
Top of cement		*Intermediate Cut/Rip		*Intermediate
		Point Plug Interval		Cut/Rip Depth
	Intermediate Csg.			
	Intermediate Csg.	\mathbb{M}^{2}	XXXX	*Intermediate Csg.
	,	Maidalla Dhur Intarral	XX	
	1	*Middle Plug Interval	XXX	
		X	XXX	
]	*Long String Cut/Rip	(\$\frac{1}{2}\text{\$\frac{1}{2}}	*Long String Csg
Top of Cement	3	Point Plug Interval	◇◇	Cut/Rip Depth
	Packer Depth	3		
	None	Bottom Plug Depth	XXX	Long String Csg.
Perforations X	Long String Csg.	1530-0		1540
	10 3/4@ 1540	*Mechanical Plug Depth		
Hole Size	* Depth	1530		Depth
Cavern	1735			1735
** Add Any Additional Information		M AJJ A., AJ 500		
* May not Apply		 Add Any Additional Information May not Apply 		
LIST OF ALL OPEN AND/OR PE	FREORATED INTERVALS	AND INTEDVALS WHERE	ASING WILL BE VA	DIED
Specify Open Hole/ Perforations/ Varied Casing	From	То	Formation	
Open Hole	1540	1735	B- Salt	much branch chart of the same

			UNI		NVIRONMENT ASHINGTON, I	AL PROTECTION	N AGEN		1490		01 0
			PLU			NDONMEN'	T PLAN				
WELL NAM		FIELD NAME, LE	ASE NAM	E & NUMBEI	₹	NAME, ADDRE Sunoco Partn 7155 Inkster F Taylor Michig 313-292-9822	ers Marketing Rd an 48180			OPERA	TOR
			STATE	<u> </u>	COUNTY	010-202-0022			STATE	PERMIT NU	JMBER
	ell and Outline U lat - 640 Acres	nit on	Michiga	n	Wayne	Walter Walter Company				26443	
Section	N N			OCATION DESC		of Section _12	Tourshi	20 D		188 78	
		6	LOCATE W Surface Location	ELL IN TWO DIR 846	ft. From (N/S)	North Line	PTownship ARTER SECTION A of Quarter Section	ND DRILLING UNI	T SE		
			And	237	ft. From (E/W)	East Line	of Quarter Sec	tion		2-VIVO - 1-5-	
-	·		TYF	E OF AUT	HORIZATION		WELL	Class I			
			1	☐ Individua	al Permit		ACTIVITY		zardous		
1				✓ Rule				1925/1869	nhazardo	us	
				Area Per	mit				ne Dispos frocarbor		ri
				of Wells in A					nanced Re		
			US EPA	Permit Numb	per			Class IV			
	CASING/TUBI	NG/CEMENT R	ECORD	AFTER PL	UGGING AN	D ABANDONM	ENT	METHOD (OF EMP	LACEN	/ENT
Size	Wt (lb/ft) TBG/CSG	Original Amount (CSG)	CSG to	be Left in Well	Hole Size	Sacks Cement Used	Туре	OF CEMEN			
16"	55	258	258		20"	400	Class A	~	alance Me		
10 3/4"	32.75	1507	1507		13 3/4"	800	Class A		ump Baile		Ė
						ļ	-	- -	vo Plug N	1ethod	
CEMENT	TO PLUG AN	D ABANDON D	ATA	Plug #	Plug #	Plug #	Plug#	Plug#	ther Plug#		Diver #
Size of Hole or	Pipe in Which Plug V	Vill Be Placed (inches)		10.19"	10 1/5	1 .09 #	1 lugar	riug#	Flug #		Plug#
Calculated Top Measured Top					0						
Depth to Botton	of Plug (ft.)		-	1497	1497'		 	-			
Sacks of Ceme					720						
Slurry Weight (o be Used (cu. Ft.) b./gal.)				849 15.6	-		4			
Type of Cemen	, Spacer or Other Ma	iterial Used		Bridge Plug	Class A		 	 	+-		
Type of Preflusi	n Used				Fresh						
3. Trip in ho 4.Cut off all	e Plug at 1497" le with tubing an casings 3' below	d spot 720 sxs Cla grade and weld on d EPA Plugging F	ss A cemo	ent in 500' sta	ges from 1497-0		DURE				
Coment	· · · · · · · · · · · · · · · · · · ·					ING AND ABA	NDONMENT		***************************************		
Cement Logging			\$ -		Cast Iron Bridg		MACON CONTRACTOR STREET		\$ \$	-	2,800
Rig or Pullin	g Unit		\$ -		Miscellaneous				\$		8,612
			\$ -		Total	TION			\$	-	28,73
NAME AND OF	all attachments I believe that the false information	ne penalty of law the and that, based on a information is tru n, including the pos	n my inqui. e, accurat	ry of those inc e, and comple	dividuals immedi ete. I am aware	h the information s ately responsible i that there are sign	for obtaining the	information		IGNED	
Dave Justin Vice President 7/27/2004											

ORIGINAL WELL CONSTRUCTION	DUK 3 OPERATION	PLUGGING ANL BANDONMENT CONSTRUCTION			
LPG #7					
	Surface		Surface		
		Top Plug Interval	CONTRACTOR OF THE PARTY OF THE		
		Top Flug Interval			
Top of cement					
		XXX			
	Surface Casing		Surface Casing		
	XX 16" @ 258		258		
	XX	*USDW Base Plug Interval	USDW Base		
			240		
		众分	XXXX		
Top of cement		*Intermediate Cut/Rip	*Intermediate		
		Point Plug Interval	Cut/Rip Depth		
	Intermediate Csg.		*Intermediate Csg.		
		XX			
	ĺχĺ	*Middle Plug Interval			
	X	Wilddie Filig interval			
	∑	\			
	ĺχ (X)	*Long String Cut/Rip	*Long String Csg		
		Point Plug Interval	Cut/Rip Depth		
Top of Cement	Part Part		XX		
	Packer Depth None				
[]		Bottom Plug Depth	Long String Csg.		
Perforations	Long String Csg.	1497-0	1507		
	10 3/4@ 1507	*Mechanical Plug Depth			
Hole Size	* Depth	1497	Depth		
Cavern	1732		1732		
** Add Any Additional Information		** Add Any Additional Information			
* May not Apply		* May not Apply			
LIST OF ALL OPEN AND/OF	R PERFORATED INTERVALS	AND INTERVALS WHERE O	ASING WILL BE VARIED		
Specify Open Hole/ Perforations/ Varied Casing	From	То	Formation Name		
Open Hole	1507	1732	B- Salt		

MI-163-3G-A002 Page B-7 of 8

			UNIT			AL PROTECTION	AGENC			-Vaditus-	
			DI 116		ASHINGTON, D).C. 20460 IDONMENT	DI ANI				
WELL NAME	F & NUMBER 6	HELD NAME LEA					~~~	IIINDED OF O	ANED / O	DEDAT	FOR
OULLE HANNI	WELL NAME & NUMBER, FIELD NAME, LEASE NAME & NUMBER						NAME, ADDRESS, & PHONE NUMBER OF OWNER / OPERATOR Sunoco Partners Marketing and Terminals LLp				
LPG Stora	ge #9					7155 Inkster R		and remina	is LLP		
	•	8.				Taylor Michiga					
						313-292-9822					
		_	STATE		COUNTY				STATE PER		MBER
	ell and Outline U at - 640 Acres	nit on	Michiga:	OCATION DESC	Wayne] 29	9090	
	N					of Section _12	Township	3S Range	e 9E		<i>"</i>
		: :]	LOCATE WI	LL IN TWO DIRE	ECTIONS FROM NE	AREST LINES OF QUA	ARTER SECTION A	ND DRILLING UNIT			
┟╍┾╍┿			Surface Location	1286	ft. From (N/S)	North Line	of Quarter Sect	ion			
			And		ft. From (E/VV)		of Quarter Sect				
L			TYP	F OF AUT	HORIZATION		WELL	Class I			
				☐ Individua			ACTIVITY	☐ Hazi	ardous		
					a remit		ACTIVITI		hazardous		
				✓ Rule			-	Class II			
<u>-</u>			N 10	Area Per	mit			Brine	e Disposal		
			*						rocarbon S		
			Number	of Wells in Ar	rea Permit			Transaction of the Control of the Co	anced Reco	overy	
		·				*********		Class III			
			US EPA	Permit Numb	er	***************************************		Class IV	****		
(CASING/TUBI	NG/CEMENT R	ECORD	AFTER PL	UGGING ANI	ABANDONM	ENT	METHOD O	F EMPL	ACEN	/ENT
Size	Wt (lb/ft) TBG/CSG	Original Amount (CSG)	CSG to	CSG to be Left in Well Hole Size Sacks Cemont Used Type OF CEMENT PLUGS							
16"	55	247	247		20"	550	Class A		lance Meth		
10 3/4"	32.75	1499	1499	- unnuonemper	13 3/4"	755	Class A		mp Bailer I		1
			<u> </u>		-		<u> </u>		o Plug Met	thod	
CEMENT	TO PLUG AN	D ABANDON D	ATA	Plug #	Plug#	Plug#	Plug#	Plug #	Plug #		Plug #
Size of Hole or I	Pipe in Which Plug V	Will Be Placed (inches)		10.19"	10 1/5	Tidg #	T TOGIN	Tiug #	lug #		r lug #
Calculated Top Measured Top of					0				 		
Depth to Bottom	n of Plug (ft.)	*		1482	1482	-		·	+		
Sacks of Ceme	nt to be Used o be Used (cu. Ft.)				720 849						
Slurry Weight (I					15.6	 			-		
Type of Cement Type of Preflust	t, Spacer or Other Ma	aterial Used		Bridge Plug	Class A						
Type of Plenusi	TUSEG		г	ESCRIPTION	Fresh	GING PROCEI	TIPE	1			
1. Pull Tubir	J g		_		011 01 1 200	omo i noozi	30112				
2. Set Bridge	e Plug at 1482"										
3. Trip in ho	le with tubing an	d spot 720 sxs Cla	ss A cem	ent in 500' sta	ges from 1482-0)'					
4.Cut off all	casings 3' below	grade and weld or	n 1/2 inch	steel plate. W	eld MDEQ # on	cap					
5. Prepare a	and file MDEQ ar	nd EPA Plugging F	Reports.								
			ESTIMA	TED COST	T OF DI LIGGI	NG AND ABAI	MONIMENT				
Cement			\$ -		Cast Iron Bridg		ADOMINEM	***************************************	\$		2,800
Logging Rig or Pullin	a Unit		\$ -	0	Cement Retain				\$	-	0
rtig or Fullin	g Onit		\$ - \$ -	3,700	Total				\$	-	8,612 28,734
					CERTIFICA	ATION					
	I certify under ti	he penalty of law ti	hat I have	examined and	d am familiar witt	the information s	ubmitted in this	document and			
F	all attachments	and that, based or	n my inqui	ry of those inc	dividuals immedia	ately responsible t	for obtaining the	information,			
	false information	e information is tru n, including the pos	e, accurat ssibility of	e, and comple fine and imori	sonment Asset 2	tnat there are sigr (0∕CFR 144 32)	nncant penalties	s for submitting			
	COL RESPONDE TO SERVICE	, sions any the po-				y (1 (177.02)					
NAME AND OF	FICIAL TITLE in Vice Pres	ident		SIGNATURE	1. 11				7/27/2		

ORIGINAL WELL CONSTRUCTION	DUNING OPERATION	PLUGGING ANL ABA	NDONMENT CONSTRUCTION
150 10			
LPG #9			
n.: 2			
	Surface		Surface
Val	XXX		- Culture
선생회		Top Plug Interval	$\times \sqrt{ X }$
			\sim
Top of cement	XXX	KKK	
			XX X X X
	XXX		XXXXX
	Surface Casing		Surface Casing
	16" @ 247	*USDW Base Plug	XXXX
		Interval	USDW Base
		XX	240
[점점]	KI (I		XXXX
			\$\frac{1}{2}
Top of cement	KJ ()	*Intermediate Cut/Rip	*Intermediate
	[\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Point Plug Interval	Cut/Rip Depth
			XX (XX)
	Intermediate Csg.	KK	*Intermediate Csg.
		ЩХ	
	[X]	*Middle Plug Interval	$\times \times Q $
	13	Wilddie Flug Interval	\times
	[X]		$\times \times \mathcal{Y} $
			[XX]X
	K)	*Long String Cut/Rip	Long String Csg
	2	Point Plug Interval	Cut/Rip Depth
Top of Cement	121	I K	K
	Packer Depth		
 	None None	\ \text{\delta}	
Perforations	Lang Shirt San	Bottom Plug Depth	Long String Csg.
Periorations	Long String Csg.	1482-0X	1499
	10 3/4@ 1499	*Mechanical Plug Depth	
Hole Size	* Depth	1482	Depth
Cavern	1742		1742
** Add Any Additional Information		** Add Any Additional Information	
* May not Apply		* May not Apply	
	R PERFORATED INTERVALS	T	Y
Specify Open Hole/ Perforations/ Varied Casing Open Hole	From 1499	To 1742	Formation Name B- Salt
Open note	1499	1742	D- 3dil

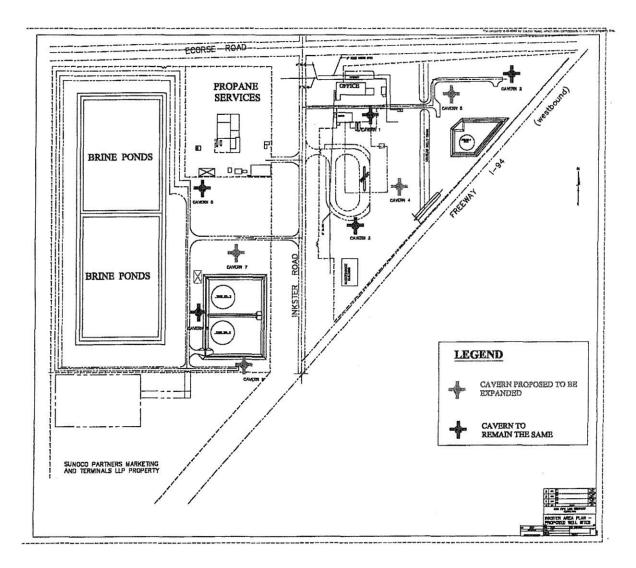
CORRECTIVE ACTION PLAN

No corrective action is required at this time.

Name and locations of wells authorized under this permit

Well Name	Surface Location	Formation
1.LPG Storage #4	SW/4 of NW/4 of NW/4 Section 7-T3S-R10E	"B" Unit of the Salina Group
2.LPG Storage #5	NW/4 of NW/4 of NW/4 Section 7-T3S-R10E	"B" Unit of the Salina Group
3.LPG Storage #7	SE/4 of NE/4 of NE/4 Section 12-T3S-R9E	"B" Unit of the Salina Group
4.LPG Storage #9	SE/4 of NE/4 of NE/4 Section 12-T3S-R9E	"B" Unit of the Salina Group

The property is divided by Inkster Road, which also corresponds to the city property line.



I-163-3G-A002 age D-2 of 5



SUMMARY: INJECTION PROCEEDURE

Sunoco Partners Terminal and Marketing LLP.

7155 Inkster Road, Taylor, MI 48180.

PRESENTLY: Brine is used to displace the LPG's (propane, butane, iso-butane) stored in the existing 8 operational caverns (numbered #1 to #9 with #8 being out of service).

The existing facility has two 500,000BBL brine ponds located within the property. These act as brine supplies and reservoirs.

When LPG <u>deliveries</u> are made to the facility, they are pumped into the caverns via an existing network of pipelines. This product displaces the brine resident in the caverns, which is then piped into the brine ponds via a flow through 10,000BBL brine tank that acts like a transition vessel.

When LPG <u>movement out</u> of the caverns is desired, brine from the existing above ground ponds is pumped, via two existing pumps, P11 and P14, into the caverns. This displaces the LPG's from the caverns into the existing pipeline system, which are in turn piped to various locations throughout the pipeline system.

PROPOSED:

Use fresh water to displace the LPG's in the caverns targeted for expansion ONLY.

All other caverns shall remain in the existing BRINE / LPG service under same conditions. One pond shall be designated to accommodate the caverns not slated for expansion.

When LPG movements are required out of the caverns, we shall inject fresh water into the existing caverns slated for expansion via the existing pumps, P11 and P14. This fresh water shall displace the LPG's, which will then be piped to their final destination.

The fresh water will reside in the cavern for a period of time (+/- 6 months) causing leeching of the caverns and thus expand them. The leeching will convert the fresh water into water containing leeched salt, becoming (leeched) brine from the cavern formation. Cavern characteristics including pressure shall be monitored at all times and fluid movement controlled to facilitate safe cavern operations. Brine concentrations and scheduled sonar tests will determine the actual cavern growth rate and volume.

Months later when LPG deliveries into the (same) caverns are desired, the leeched brine (originally fresh water) resident in the caverns shall be displaced by the LPG's from the pipeline. The leeched brine shall be pumped into the existing ponds via the flow through tank.

However, since the existing facility can only accommodate approximately 1,000,000 BBLS of brine storage, it will be necessary to dispose of this brine into the proposed 'Brine Disposal Well' permitted under MI-DEQ and US-EPA.

Any additional brine not available from the ponds shall be obtained from a proposed brine production well.

Sunoco Partners Marketing & Terminals is always required to conduct cavern monitoring during fluid injection in accordance with 40 C.F.R. 146.33.



BRIEF BUSINESS DESCRIPTION

COMPANY: Sunoco Logistics Partners L.P. (NYSE: SXL)

ADDRESS: 10 Penn Center

1801 Market St.

Philadelphia, PA 19103-1699

Phone: 215-977-3000 Fax: 215-977-3409

Sunoco Logistics is a Master Limited Partnership formed by Sunoco, Inc., to acquire, own, and operate a geographically diverse group of crude oil and refined product pipelines, terminalling, and storage facilities. As a part of Sunoco, Inc., we have over 110 years experience in transportation, terminalling, and the storage services. Our business is made up of three segments: the Eastern Pipeline System, Terminal Facilities, and the Western Pipeline System.

Sunoco Logistics Partners owns and operates a large swath of its midstream and downstream assets. This includes nearly 5,000 miles of crude oil and refined product pipelines, located primarily in eastern half of the US, as well as more than 30 terminals and other storage assets related to Sunoco's refining and marketing operations in the Midwest, Gulf Coast, and Eastern seaboard states. Sunoco Logistics Partners also purchases domestic crude and resells it to Sunoco's refining and marketing division. Sunoco subsidiary Sunoco Partners controls about 75% of the company.

FACT SHEET:

L EASTERN PIPELINE SYSTEM

Our Eastern Pipeline System primarily serves the Northeast and Midwest United States operations of Sunoco, Inc. (R&M) and comprises of, among other assets, approximately 1,700 miles of refined product pipelines. Our refined product pipelines transport refined products from Sunoco, Inc. (R&M)'s Philadelphia, PA, Marcus Hook, PA, Eagle Point, NJ, and Toledo, OH refineries, as well as from third parties, to markets in New York, New Jersey, Pennsylvania, Ohio, and Michigan.

The refined products transported in these pipelines include multiple grades of gasoline, low-octane gasoline for ethanol blending, distillates that include high- and low-sulfur diesel and jet fuel, LPGs (such as propane, butane, iso-butane, and a butane/butylene mixture), refining feed-stocks, and other hydrocarbons (such as toluene and xylene).

A 123-mile wholly owned crude oil pipeline, from Maryville, Michigan to refineries in the Toledo, Ohio area, including a Sunoco, Inc. owned refiner.



II. FACILITY SPECIFIC:

Sunoco Logistics L.P. has a facility addressed at 7155 Inkster Road, Taylor, MI 48180. This facility is physically located at the junction of Ecorse and Inkster Roads within the cities of Romulus and Taylor in Wayne County, southeast Michigan.

The facility is a pipeline terminal used for the storage and distribution of Liquified Petroleum Gasses (LPG's). Storage is in eight (8) working caverns, which have a total storage capacity of about ONE MILLION BARRELS of LPG's. The caverns range in size from 60,000 BBLS to 165,000 BBLS. The first cavern was leached in 1946 and the last capacity enlargement was in 1973. The bulk source of the LPG's stored at this facility originate from Sunoco's Toledo Refinery.

The site has nine (9) caverns solution mined from the SALINAS salt formation. Four of the operating caverns are in the "F" salt layer at 1,175 feet to 1,280 feet and four are in the "B" salt layer at 1,510 feet to 1,730 feet. Sunoco is looking at expanding the latter group. One cavern, #8, has been plugged and abandoned.

SIC Code that best describes this activity is 2911 – PETROLEUM REFINING.

CLASS III UNDERGROUND INJECTION CONTROL PERMIT MINOR MODIFICATION FOR SIGNATURE

Permittee: SPMT	UIC Permit No: MI-163-3G-0A002
City/State: Taylor, MI 48180	County: Wayne Well: Sunoco Inkster Facility
A. Changes made to the Permit	
Page/Permit Condition	<u>Modification</u>
Page14/Special Condition Ch Attachment D	anged "If Required" to "Attached"
Te mo	d a new paragraph "Sunoco Partners Marketing & rminals LLP is always required to conduct cavern onitoring during fluid injection in accordance with 40 F.R. 146.33 (a)(1) to comply with the order of the vironmental Appeals Board".
B. Final Permit Concurrence	
1. Permit Writer 2. Permit Team Leader 3. EPA Assistant/Sec'y 4. Direct Implementation C 5. UIC Branch Chief/Sec'y 6. UIC Branch Chief 7. Water Division Director 8. UIC-Permit Administrate ***********************************	Date:
Financial Assurance: State Bond	Amount: 30,000
Injection Pressure: 382	Injection zone top 1150
Specific Gravity: 1.05	
Fracture Gradient (if over 0.8):	
Corrective Action Plan Due Date:	
Release Financial Assurance (if a	oplicable) Yes No (Financial Statement or State Bond)
Comments:	
**************	****************
Action Required	
* Water division director: Please si	gn both original cover pages (two provided) (14.56)

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REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) UNDERGROUND INJECTION CONTROL CLASS III PERMIT

Permit Number: MI-163-3G-A002

Facility Name: Sunoco Inkster Facility

Pursuant to the provisions of the Safe Drinking Water Act, as amended (42 U.S.C. 300f et seg., commonly known as the SDWA) and implementing regulations promulgated by the United States Environmental Protection Agency (USEPA) at Parts 124, 144, 146 and 147 of Title 40 of the Code of Federal Regulations (40 CFR), Sunoco Partners Marketing & Terminals L.P. of Taylor, Michigan is authorized to operate four existing wells located in a permit area limited to the W/2 of NE/4 & SW/4 & NW/4 of the NW/4 of the NW/4 of Section 7, Township 3 South, Range 10 East and the NE/4 & SE/4 of the NE/4 of the NE/4 of Section 12, Township 3 South, Range 9 East in Wayne County, Michigan. Injection shall be limited to the F, E, D, C and B units of the Salina Group between 1150 and 1800 feet, upon the express condition that the permittee meet the restrictions set forth herein. The names and locations of wells authorized under this permit and a map of the permit area are provided in Part III(D) of this permit. Additional injection wells may be constructed and operated within the permit area provided that the permittee notifies the Director prior to construction and all permit requirements are met. Injection shall not commence into any newly drilled or converted well until the operator has received authorization in accordance with Part I(E)(10) of this permit.

The purpose of the injection is limited to solution mining of salt to enlarge existing salt caverns for hydrocarbon storage.

All references to 40 CFR are to all regulations that are in effect on the date that this permit is effective.

Signed and dated: Gure 6,2005
Charles J. Elly

Jo Lynn Traub

Director, Water Division