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RE: Petition to Review (Appeal) Permit for Windfall Oil & Gas, Inc. ENVIR. APPEALS BOARD
PERMIT #: PAS2D020BCLE
PERMITTED FACILITY: Class II-D injection well, Zelman #1

November 16, 2014

Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Avenue, NW
WJC East, Room 3334
Washington, DC 20004
PHONE NUMBER - 202-233-0122

The issue being presented for review by this appeal is the proposed disposal injection well site to be located in Brady Township. The appeal is in compliance with the EAB word limits. The main concern revolves around inaccuracies in the EPA Response Summary, inaccuracies in the Windfall permit application and the lack of consideration given to fault lines in the injection area. The current EPA finding has determined that the proposed injection site contains no faults or previously fractured wells within a ¼ mile radius. The EPA has also determined that this injection site poses no harm to current drinking water wells. It should be submitted for record that this is a misstatement and not clearly supported based on the following records. Below is a statement of the nature of the case and the facts relevant to the issues presented for review.

As a concerned citizen regarding this matter I would like to raise the following objections and cite conflicting evidence with the current EPA decision and the associated misstatements in their EPA Response Summary. Please consider the following points for review.

1. Maps not meeting EPA criteria for permit approval.

It was stated that topographical maps for the 1 mile radius are on file as per the permit approval requirement. However no such maps have been found on file at the library.

2. Fractured wells on the edge of the ¼ mile border the permit area.

It was stated that nearby fractured wells reside ½ mile from the proposed site; however, this is far from accurate as the majority of gas wells reside on the boundary of the ¼ mile radius.

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3. Concern over the existence of fault blocks

The EPA states that wells have not been producing outside of the fault blocks however this is not true as the Atkinson well has produced and is on the other side of the fault. This brings into concern the adequacy of these supposed fault blocks.

Inaccuracies from the initial permit

1. Existence of 50 foot confining zone layer and the actual confining zone layers

Further arguments

1. The existence of fault blocks are not conclusive
2. Coals mines exist in the area and the potential for a major catastrophe is present if injection fluids are not confined properly

Due to the existence of fractured wells on the boundary of the ¼ mile radius, the doubtful nature of fault blocks, water wells existing within the same area and abandoned coal mines also occupying the same space it seems very clear that this permit needs to be denied. There is an overall lack of geological information regarding this site and it would be shameful to see a disaster transpire due to poor oversight and monitoring. Such an occurrence would be ruinous to our community and also the future of the gas industry as safe and responsible practices should be the standard. Considering the grave nature of a failure in planning we would certainly hope that all issues and concerns would be thoroughly addressed.

Sincerely,



Robert Green