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EPA REG

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Claremore, OK 74017
August 29, 2017
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Ms. Lorena Vaughn
Regional Hearing Clerk (6RC-D)
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

The submitted written comments are in reference to the following three Document Numbers:

SDWA-06-2017-1110 (Jireh Resources, LLC)

SDWA-06-2017-1112 (Novy Oil and Gas, Inc.(Grayhorse Operating LLC)

SDWA-06-2017-1111 (Warren American Company, LLC)

I appreciate the EPA's efforts in determining the saltwater leakage into the North Bird Creek water in Osage County, Oklahoma. I also support the EPA's pursuit of corrective actions against those Corporations or Limited Liability Companies whose saltwater injection wells were determined to be responsible for that leakage. It would appear that examinations and testing by the EPA investigative team determined that the named companies or LLC's failed to confine injected fluids to the approved or authorized injection zone.

I support the EPA's Administrative Orders requiring the Jireh Resources, LLC, the Novy Oil and Gas, Inc. (Grayhorse Operating LLC), and Warren American Company, LLC to either "shut-in" injection wells as listed or to "shut down" injected wells as listed for the various companies. While those companies will be impacted by those actions, landowners and pasture grazing operators have already been financially impacted, AND may continue to be adversely affected if the proposed EPA actions are not implemented.

The examination of the cause of the saltwater leak took over a year to determine that the salt water surfaced from salt water injection wells. The loss of a year (August of 2016 to August of 2017) of livestock grazing on the Osage bluestem grass resulted in a financial losses to land owners and livestock operators..

There may be other abandoned salt water disposal wells or improperly capped oil wells that will emerge. There is reason to believe that there will be future problems with the older oil fields. I would hope that there would be continued monitoring and oversight of all saltwater disposal wells as well as review of surface saltwater or oil spills. **How this particular saltwater "spill" is managed will set precedent for future spills.** The investigation of such spills needs to

have independent, trained, and available personnel to collect the needed information to be submitted to certified testing laboratories. There needs to be an immediate response to the emergency. This can only properly done by the EPA. The EPA has the regulations and authority,

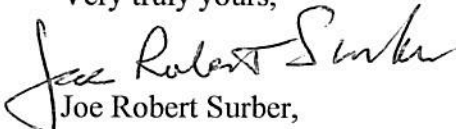
The Osage Cattle Company, LLC, of which I am the manager and sole proprietor, leases the one hundred and fifty (155) acres from a non-restricted Osage native, Mr. Lawrence Potts. I have leased this property for the past ten (10) years and my brother years before 2007. The land remains unusable since August 2016 since the only source of water is the unusable North Bird Creek.

Legal Description of above grazing lease property:

SW/4 of the NW/4, NW/4 of the SW/4
Section 18 of T27N R8E
N/2 of the SE/4 Section 13 T27 N R7E

I am appreciative of the efforts of the EPA to initiate action to limit the damages resulting from the saltwater injection wells contamination of the North Bird Creek water source. Thanks for your assistance in this situation.

Very truly yours,


Joe Robert Surber,
Osage Cattle Company, LLC