# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (USEPA) — REGION III UNDERGROUND INJECTION CONTROL PERMIT NUMBER PAS2D219BWAR AUTHORIZATION TO OPERATE CLASS II-D INJECTION WELL

EFFECTIVE: OCTOBER 31, 2016 / EFFECTIVE UNTIL: OCTOBER 31, 2026



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

# <u>UNDERGROUND INJECTION CONTROL PERMIT NUMBER PAS2D219BWAR</u> AUTHORIZATION TO OPERATE CLASS II-D INJECTION WELL

In compliance with provisions of the Safe Drinking Water Act, as amended, 42 U. S. C. §§ 300f et seq. (SDWA) and the SDWA implementing regulations promulgated by the U. S. Environmental Protection Agency at Parts 144-147 of Title 40 of the Code of Federal Regulations, this permit authorizes

Bear Lake Properties, LLC 3000 Village Run Road, Unit 103, #223 Wexford, Pennsylvania 15090

to convert the Smith-Ras #1 well into a Class II-D commercial brine disposal Injection Well (hereinafter, "Injection Well" or "Facility") and to operate the Injection Well for the purpose of injecting fluids produced in association with oil and gas production operations in accordance with the provisions of this permit. The Injection Well will be located in Columbus Township, Warren County, Pennsylvania. The coordinates for the Injection Well are: Latitude 41° 59' 33.8" and Longitude -79° 32' 01.9".

All references to Title 40 of the Code of Federal Regulations (C.F.R.) are to all regulations that are in effect on the date that this permit is effective.

This permit shall become effective on Ucrosee 31. 2016.

This permit shall remain in effect until midnight October 31, 2026.

Signed this 315 day of October , 2016.

Jon M. Capacasa, Director

#### PART 1

## A. Effect of a Permit

Bear Lake Properties, LLC (the "Permittee") is allowed to engage in underground injection at the Injection Well in accordance with the conditions of this permit. The Permittee shall not allow the underground injection activity, otherwise authorized by this permit, to cause or contribute to the movement of fluid containing any contaminant into any underground source(s) of drinking water (USDW), if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 C.F.R. Part 141 or if it may otherwise adversely affect the health of persons. Any underground injection activity not authorized in this permit or otherwise authorized by permit or rule is prohibited. Issuance of this permit does not convey property rights or mineral 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 Part C or D of the SDWA, 42 U.S.C. §§ 300f-300j-11, or any other common or statutory law for any breach of any other applicable legal duty.

#### B. Permit Actions

This permit can be modified, revoked and reissued, or terminated for cause or upon request as specified in 40 C.F.R. §§ 144.12, 144.39 and 144.40. Also, the permit is subject to minor modifications as specified in 40 C.F.R. § 144.41. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes, or anticipated noncompliance on the part of the Permittee shall 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 Permittee's application, dated March 24, 2015, and the supplemental submission dated July 17, 2015, collectively referred to as the "Application", is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

## D. General Requirements

1. <u>Duty to Comply.</u> The Permittee shall comply with all applicable UIC regulations, including 40 C.F.R. Parts 124, and 144-147, and with the conditions of this permit, except to the extent and for the duration that EPA authorizes any noncompliance in an emergency permit issued under 40 C.F.R. §144.34. Any permit noncompliance constitutes a violation of the SDWA and is grounds for

- enforcement action, permit termination, revocation and reissuance or modification, or for denial of a permit renewal application.
- 2. Need to Halt or Reduce Activity not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 3. <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.
- 4. 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, adequate security to prevent unauthorized access and operation of the Injection Well 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 this permit.
- Duty to Provide Information. The Permittee shall furnish to the Director of the Water Protection Division ("Director"), within a time specified by the Director, 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 to be kept by this permit. If the Permittee becomes aware of any incomplete or incorrect information in the Permit Application or subsequent reports, the Permittee shall promptly submit information addressing these deficiencies.
- 6. <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 the law to:
  - a. Enter upon the Permittee's premises where the Facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- c. Inspect, at reasonable times, the Facility, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
- d. Sample or monitor at reasonable times any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by the SDWA.
- 7. Penalties. Any person who violates a requirement of this permit is subject to administrative or civil penalties, fines and other enforcement actions under the SDWA. Any person who willfully violates conditions of this permit is subject to criminal prosecution.
- 8. Transfer of Permits. This permit is not transferable to any person except after notice is sent on EPA Form 7520-7, approval is received from the Director, and the requirements of 40 C.F.R. § 144.38 are satisfied. 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 or its implementing regulations. The transferee is not authorized to inject under this Permit unless and until the Director notifies the transferee that the transferee is so authorized through issuance of a revised permit identifying the transferee as the permittee.

### 9. Signatory Requirements.

- a. The Permittee shall sign all reports required by this permit and other information requested by the Director as follows:
  - (1) for a corporation, by a responsible corporate officer of at least the level of vice-president;
  - (2) for a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
  - (3) for a Municipality, State, Federal, or other public agency by either a principal executive officer or a ranking elected official.
- b. A duly-authorized representative of the person designated in paragraph a. above may also sign only if:
  - (1) the authorization is made in writing by a person described in paragraph a. above;

- (2) the authorization specifies either an individual or a position having responsibility for the overall operation of the regulated Facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or a position of equivalent responsibility. A duly authorized representative may thus be either a named individual or any individual occupying a named position; and
- (3) the written authorization is submitted to the Director.
- c. If an authorization under paragraph b. of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the Facility, a new authorization satisfying the requirements of paragraph b. of this section must be submitted to the Director prior to or together with any reports, information or applications to be signed by an authorized representative.
- d. Any person signing a document under paragraph a. or b. of this section shall make the following certification:

"I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

## 10. Confidentiality of Information.

- a. In accordance with 40 C.F.R. Parts 2 (Public Information), and § 144.5, any information submitted to the Director 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, EPA may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 C.F.R. Part 2.
- b. EPA will deny any claims of confidentiality for the following information:
  - (1) The name and address of any permit applicant or permittee.

- (2) Information which deals with the existence, absence, or level of contaminants in drinking water.
- 11. Reapplication. If the permittee wishes to continue an activity regulated by this permit after the expiration date of the permit, the permittee must submit a complete application for a new permit at least 100 days before this permit expires.
- 12. <u>State Laws.</u> Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation.

#### PART II

#### A. General

The Permittee shall sign and certify copies of all reports and notifications required by this permit in accordance with the requirements of paragraph I.D.9 of this Permit and shall submit such information to the Director at the following address:

Ground Water & Enforcement Branch (3WP22)
Office of Drinking Water and Source Water Protection
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103

#### B. Record Retention

- 1. The Permittee shall retain records of all monitoring and other information required by this permit, including the following (if applicable), for a period of at least five years from the date of the sample, measurement, report or application, unless such records are required to be retained for a longer period of time under paragraph II. B.2 below. This period may be extended by the Director at any time. If the period is extended, the Permittee shall comply with the new period.
  - a. All data required to complete the Permit Application form for this permit and any supplemental information submitted under 40 C.F.R. § 144.31;
  - b. Calibrations and maintenance records and all original strip chart recordings for continuous monitoring instrumentation;
  - c. Copies of all reports required by this permit;

- 2. The Permittee shall retain records concerning the nature and composition of all injected fluids, as listed in paragraphs II.C.4 and C.5 of this permit, until at least three years after the plugging and abandonment procedures are complete. The Permittee shall continue to retain these records after the three year retention period unless he or she delivers the records to the Director or obtains written approval from the Director to discard the records.
- 3. Records of monitoring information shall include:
  - a. The date, exact place, and the time of sampling or measurements;
  - b. The individual(s) who performed the sampling or measurements;
  - c. A precise description of both sampling methodology and the handling (custody) of samples;
  - d. The date(s) analyses were performed;
  - e. The individual(s) who performed the analyses;
  - f. The analytical techniques or methods used;
  - g. The results of such analyses.

# C. Monitoring Requirements

- 1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The Permittee shall obtain representative sample(s) of the fluid to be analyzed and conduct analysis(es) of the sample(s) in accordance with the approved methods and test procedures provided in 40 C.F.R. § 136.3 and EPA's SW-846 Compendium, or methods and test procedures otherwise approved by the Director. The Permittee shall identify in its monitoring records the types of tests and methods used to generate the monitoring data.
- 2. The Permittee shall continuously monitor and record surface injection pressure, annular pressure, flow rate and cumulative volume in the Injection Well beginning on the date the Injection Well commences operation and concluding when the Injection Well is plugged and abandoned. The Permittee shall compile the monitoring data monthly to complete the Annual Report referenced in paragraph II.D.8 of this permit.
- 3. The Permittee shall also monitor and record semi-annually the fluid level of all of the following depleted gas production wells identified in the Application:

- a. R. Trisket #1, located approximately 4200 ft. northwest of the Injection Well;
- b. R. Trisket #2, located approximately 3700 ft. to the west of the Injection Well;
- c. T. Reed #4, located approximately 1500 ft. to the southwest of the Injection Well;
- d. D. Wright #1, located approximately 2,000 ft. to the east of the Injection Well; and
- e. R. Craker #1, located approximately 3700 ft. northeast of the Injection Well.

In the event that in the future the T. Reed #4 is converted from a monitoring well to a UIC-Permitted well, upon issuance of the UIC permit for T. Reed #4, the Permittee will used both the W.W. Hammond #1 and the T. Reed #2 wells as replacement monitoring wells for the T. Reed #4.

If fluid levels in any of the monitoring wells listed above is observed to rise within 100 feet of the base of the USDW, the Permittee shall stop disposal operations immediately, and shall notify the EPA orally (phone numbers: (215 814-5469 or (215) 814-5498) within 24 hours of the observation and shall send written notification to EPA within 5 days of the observation. EPA will evaluate the operating conditions in order to instruct the Permittee on how to control the fluid level.

If the fluid level in a monitoring wells is observed to rise within 100 feet of the top of cement of the long-string casing, that is, it rises to the depth listed in the table below, the permittee shall stop injection operations immediately, and shall notify the EPA orally (phone numbers: (215) 814-5469 or (215) 814-5498) within 24 hours of the observation and shall send written notification to EPA within 5 days of the observation. The permittee shall demonstrate mechanical integrity of the monitoring well where fluid reached the trigger depth prior to resuming injection. The MIT test will be required on that monitoring well every two years thereafter.

Monitor Depth of Well (ft)		Top of Cement (Depth - Thickness) (ft)	MIT Trigger Depth(ft)		
Craker 1	4584	3418	3318		
Hammond 1	4676	3510	3410		
Reed 2	4553	3387	3287		
Reed 4	4566	3530	3430		
Trisket 1	4432	2956	2856		
Trisket 2	4429	3082	2982		
Wright 1	4479	3313	3213		

- 4. The Permittee shall monitor the nature and composition of the injected fluid by sampling, analyzing and recording the injected fluid for the parameters listed below, at the initiation of the injection operation and every two years thereafter, and whenever the operator anticipates a change in the injection fluid (e.g., from different geologic formations, geographic regions, different customers, etc.).
  - pH
  - Specific Gravity

- Manganese
- Total Dissolved Solids

- Specific Conductance

- Sodium - Hydrogen Sulfide

- Barium

- Chloride - Alkalinity

- Iron - Dissolved Oxygen

- Magnesium - Hardness

-Total Organic Carbon (TOC)

5. The Permittee shall measure the specific gravity of each truckload prior to unloading.

- 6. The Permittee shall verbally report to the Director analytical results for specific gravity that are greater than 1.218 or for TOC greater than 250 mg/l within twenty-four hours of obtaining the results.
- 7. The Permittee shall make a demonstration of mechanical integrity in accordance with 40 C.F.R. § 146.8, after the initial demonstration, at least once every two (2) years. Subsequent two (2) year demonstrations shall be conducted no more than thirty (30) days prior to the anniversary date of the issuance of this permit. In addition to the above requirement, the Permittee shall conduct a mechanical integrity test demonstration on the Injection Well when the protective casing or tubing is removed from the well, the packer is reseated, or a well failure is likely, or as requested by the Director. The Permittee may continue operation of the Injection Well only if the Permittee has demonstrated the mechanical integrity of the Injection Well to the Director's satisfaction. The Permittee shall cease injection operations if a loss of mechanical integrity becomes evident or if the Permittee cannot demonstrate mechanical integrity. The Injection Well shall be equipped with an automatic shut-off device which would be activated in the event of a mechanical integrity failure.
- 8. The Permittee shall perform all environmental measurements required by the permit, including, but not limited to: measurements of pressure, temperature, mechanical integrity (as applicable) and chemical analyses in accordance with EPA guidance on quality assurance.
- 9. The Permittee shall maintain a record of every load of fluid received. The record shall include the hauler's name, the producing well operator's name, and the location from which the load was obtained, the volume of the load and whether the load of fluid delivered was a split load. If the load was a split load, each operator's name and location shall be listed and the volumes from each operator documented.

# D. Reporting and Notification Requirements

1. Report on Permit Review. Within 30 days of receipt of this permit, the Permittee shall ensure the person designated pursuant to paragraph I.D.9 of this permit

- reports to the Director that he or she has read and is personally familiar with all terms and conditions of this permit.
- 2. <u>Commencing Injection.</u> The Permittee shall not commence injection until construction or well rework is complete and all of the following conditions have been satisfied:
  - a. The Permittee has submitted notice of completion of construction (EPA Form 7520-10) to the Director;
  - b. The Permittee has demonstrated to EPA that the Injection Well has mechanical integrity in accordance with 40 C.F.R. § 146.8 and the Permittee has received written notice from the Director that such demonstration is satisfactory; and
    - (1) The Director has inspected or otherwise reviewed the Injection Well and finds it is in compliance with the conditions of this permit; or
    - (2) The Permittee has not received notice from the Director of his or her intent to inspect or otherwise review the Injection Well within 13 days of the date of the notice in paragraph II.D.2.a of this permit, in which case, prior inspection or review is waived and the Permittee may commence injection.

# 3. Twenty-four Hour Reporting.

- a. The Permittee shall report to the Director any noncompliance which may endanger, or has endangered, health or the environment. The Permittee shall provide such report orally (phone numbers: (215) 814-5469 or (215) 814-5498) within 24 hours from the time the Permittee becomes aware of the circumstances. The Permittee shall include the following information in the oral report:
  - (1) Any monitoring or other information which indicates that any contaminant may endanger, or has endangered an underground source of drinking water.
  - (2) Any noncompliance with a permit condition, malfunction of the injection system which may cause, or has caused, fluid migration into or between underground sources of drinking water, or failure of mechanical integrity test demonstrations.

- b. The Permittee shall provide a written submission within five days of the time the Permittee becomes aware of the circumstances described above. 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.
- 4. <u>Anticipated Noncompliance.</u> The Permittee shall give advance notice to the Director of any planned changes in the permitted Facility or activity which may result in noncompliance with permit requirements.
- 5. Other Noncompliance. The Permittee shall report all other instances of noncompliance to the Director in writing within ten (10) days of the time the Permittee becomes aware of the circumstances. The report shall contain the information listed in paragraph II.D.3 of this permit.
- 6. <u>Planned Changes.</u> The Permittee shall provide written notice to the Director as soon as possible of any planned physical alterations or additions to the permitted Facility.
- 7. <u>Conversion.</u> The Permittee shall provide written notice to the Director 30 days prior to the conversion of the Injection Well to an operating status other than an injection well.
- 8. Annual Report. The Permittee shall submit a written Annual Report to the Director summarizing the results of the monitoring required in Permit Condition C of Part II of this permit. This report shall include monthly monitoring records of injected fluids, the results of any mechanical integrity test(s), and any major changes in characteristics or sources of injected fluids. The report shall list the additives used in the operation of the well. The Permittee shall complete and submit this information with its Annual Report EPA Form 7520-11 (Annual Disposal Injection Well Monitoring Report). The Permittee shall submit the Annual Report to the Director no later than January 31st of each year, summarizing the activity of the calendar year ending the previous December 31st.
- 9. <u>Plugging and Abandonment Reports and Notifications.</u>
  - a. The Permittee shall notify the Director in writing at least 45 days before plugging and abandonment of the Injection Well as described in condition in Part III.C of this permit. The Director may allow a shorter notice period upon written request.

- b. The Permittee shall submit any revisions to the Plugging and Abandonment Plan attached to and incorporated into this permit (Attachment 1) to the Director no less than 45 days prior to plugging and abandonment on EPA Plugging and Abandonment Form 7520-14. The Permittee shall not commence plugging and abandonment until it receives written approval of the revisions to the Plan from the Director.
- c. To the extent that any unforeseen circumstances occur during plugging and abandonment of the Injection Well that cause the Permittee to believe the Plugging and Abandonment Plan should be modified, the Permittee shall obtain written approval from EPA of any changes to the Plugging and Abandonment Plan prior to plugging the Injection Well.
- d. Within 60 days after plugging the Injection Well, the Permittee shall submit a Plugging and Abandonment Report to the Director which shall consist of either:
  - (i) A statement that the Injection Well was plugged in accordance with the EPA approved Plugging and Abandonment Plan; or
  - (ii) Where actual plugging differed from the Plugging and Abandonment Plan previously submitted, the Permittee shall provide to the Director an updated version of form 7520-14 specifying the different procedures used.
- e. The Permittee shall ensure that the Plugging and Abandonment Report is certified as accurate by the person who performed the plugging operation.
- 10. <u>Compliance Schedules.</u> The Permittee shall submit reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit no later than 30 days following each schedule date.
- 11. <u>Mechanical Integrity Tests.</u> The Permittee shall notify the Director in writing at least 30 days prior to conducting Mechanical Integrity Testing on the Injection Well.
- 12. <u>Cessation of Injection Activity.</u> Two years after the Permittee has ceased injection into the Injection Well, the Permittee shall plug and abandon the Injection Well in accordance with the Plugging and Abandonment Plan unless the Permittee:
  - a. Provides written notice to the Director describing actions and/or procedures, necessary to ensure that the Injection Well will not endanger

any USDW during the period of temporary abandonment. These actions and procedures shall include compliance with the requirements of this permit applicable to active injection wells unless waived, in writing, by the Director;

- b. Receives approval from the Director that the actions and/or procedures described in the notice are satisfactory; and
- c. Implements such EPA approved actions and/or procedures.

# E. Mechanical Integrity

- 1. <u>Standards.</u> The Permittee shall maintain the mechanical integrity of the permitted Injection Well pursuant to 40 C.F.R. § 146.8.
- 2. <u>Request from Director.</u> The Director may by written notice require the Permittee to demonstrate mechanical integrity at any time during the term of this permit and the Permittee shall comply with the Director's request.

#### Part III

# A. Construction Requirements

- Confining Zone. Notwithstanding any other provision of this permit, the Permittee shall inject through the Injection Well only into a formation which is separated from any Underground Source of Drinking Water by a confining zone, as defined in 40 C.F.R. § 146.3, that is free of known open faults or fractures within the Area of Review as required in 40 C.F.R. § 146.22.
- 2. <u>Casing and Cementing</u>. The Permittee shall:

a. ensure the Injection Well is cased and cemented to prevent the movement of fluids into or between underground sources of drinking water and in accordance with 40 C.F.R. §§ 146.22 and 147.1955(b);

b. ensure the casing and cement used in the Injection well are designed for the life expectancy of the well;

c. ensure the Injection Well has surface casing installed from the surface to 406 feet below land surface and cemented back to the surface;

d. ensure the Injection Well has long string casing installed from the surface to 4493 feet and cemented back to approximately 2959 feet below land surface to isolate the injection zone; and

- e. install in the Injection Well a tubing string set on a packer placed above the injection zone's perforated interval at approximately 4182 feet.
- 3. Logs and Tests. In accordance with 40 C.F.R. § 146.22(f), the Permittee shall prepare logs and perform tests as follows during the construction or rework of the Injection Well: electric, gamma ray and caliper logs in the open hole, a cement bond, temperature or density log on the surface casing (if cement returns are not achieved), and a cement bond log/variable density log on the long string casing. The Permittee shall submit to the Director, for the Injection Well, cement records, a narrative report that interprets the well log(s) and test results, which specifically relate to the results of the cementing operation, and a detailed description of the rationale used to make these interpretations. The narrative report shall be prepared by a knowledgeable log analyst and submitted to the Director. The Director may prescribe additional logs or waive logging requirements in the future should field conditions so warrant.
- 4. <u>Mechanical Integrity.</u> The Permittee is prohibited from conducting injection operations in the Injection Well until it (i) demonstrates the mechanical integrity of the Injection Well in accordance with 40 C.F.R. § 146.8 and (ii) receives notice from the Director that such a demonstration is satisfactory in accordance with paragraph II.D.2 of this permit.
- 5. Corrective Action. The Permittee is prohibited from conducting injection operations in the Injection Well until it has plugged all abandoned wells identified within the area of review. If an abandoned well is discovered within the one-quarter mile area of review as identified in the Permit Application, the permittee shall notify the Director upon discovery and within five (5) days of discovery submit to the Director for approval a plan for corrective action and implement the approved plan.
- 6. <u>Completion Reports.</u> The Permittee shall prepare a written Completion Report that summarizes the activities and the results of the testing required in Condition A.1 through 5 of Part III of this permit and submit the Completion Report to the Director prior to the commencement of injection operations.

# B. Operating Requirements

- 1. <u>Injection Formation.</u> The Permittee shall inject only into the Grimsby, Power Glen, and Whirlpool sandstone of the Medina Group located in the subsurface interval between approximately 4222 feet and 4396 feet below surface elevation.
- 2. <u>Injection Fluid.</u> The Permittee shall not inject any hazardous waste as defined in 40 C.F.R. Part 261 or any fluid, other than fluids produced solely in association

- with oil and gas production operations and additives necessary to maintain the integrity of the well.
- 3. <u>Injection Volume Limitation.</u> Injection volume shall not exceed 22,500 barrels per month. A barrel consists of 42 gallons.
- 4. <u>Injection Pressure Limitation.</u> The Permittee shall not exceed a surface injection pressure maximum of 1716 psi and a bottom-hole injection pressure maximum of 4032psi. These pressures were calculated based on a maximum injection fluid specific gravity of 1.218. If the specific gravity of the injection fluid exceeds 1.218, then the Permittee shall reduce the surface injection pressure by an amount necessary to avoid exceeding the bottom-hole pressure maximum. The Permittee shall not inject fluid at a pressure which initiates fractures in the confining zone, as defined in 40 C.F.R. § 146.3, adjacent to underground sources of drinking water (USDW) or causes the movement of injection or formation fluids into an USDW.
- 5. The Permittee shall inject fluids into the well through the tubing string installed inside the long string casing. The Permittee is prohibited from injecting between the outermost casing protecting the USDW and the well bore, and also from injecting into any USDW.

# C. Plugging and Abandonment.

- 1. <u>Plugging and Abandonment.</u> The Permittee shall plug and abandon the Injection Well as provided in the EPA approved Plugging and Abandonment Plan (EPA Form 7520-14) (Attachment 1).
- 2. The Permittee shall plug and abandon the Injection Well in such a manner that fluids shall not move into or between USDWs.

# D. Financial Responsibility

1. The Permittee shall maintain continuous compliance with the requirement to maintain financial responsibility and resources to close, plug and abandon the Injection Well in accordance with 40 C.F.R. § 144.52(a)(7) in the amount of at least \$23,383. The well may not be constructed, reworked or operated if the financial responsibility for that well has not been established. Further, the Permittee must provide documentation to the Director that financial responsibility has been established for the Injection Well prior to construction, rework or operation. The Permittee will provide a Letter of Credit and Standby Trust Agreement assuring the plugging costs for the Injection Well. The Permittee shall not substitute this Letter of Credit with an alternative demonstration of financial responsibility, unless it has previously submitted evidence of that alternative

demonstration to the Director and the Director notifies it that the alternative demonstration of financial responsibility is acceptable. The Director may require the Permittee to submit a revised demonstration of financial responsibility if the Director has reason to believe that the original demonstration is no longer adequate to cover the costs of plugging and abandonment.

2. <u>Insolvency of Financial Institution.</u> 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 a trustee or the institution issuing the financial mechanism to issue such an instrument, the Permittee must immediately notify the Director in writing and submit an alternative demonstration of financial responsibility acceptable to the Director within sixty days after such an event.

USEPA APPROVED PERMIT APPLICATION AND RELATED DOCUMENTS



# BRINE DISPOSAL WELL PERMIT APPLICATION SMITH-RAS UNIT #1

**Bear Lake Properties, LLC** 

February 2015

complex world

**CLEAR SOLUTIONS™** 

# Table of Contents Underground Injection Control (UIC) Class II Well Permit Application Bear Lake Properties, LLC Smith-Ras Unit #1 Well Columbus Township, Warren County, PA

Section 1 – Area of Review Methods/Calculations
Section 2 – Maps of Well Area and Area of Review
Section 3 – Corrective Action Plan and Well Data
Section 4 – Name and Depth of USDWs
Section 5 – Geologic Data On Injection and Confining Zones
Section 6 – Operating Data
Section 7 – Well Construction Details
Section 8 – Monitoring Program
Section 9 – Plugging and Abandonment Plan
Section 10 – Necessary Resources
Section 11 – Plan for Well Failures

Appendix A – Surrounding Landowner Information

United States Environmental Protection Agency

9 <sub>6</sub> 00	EPA ID Number	ALTER SE	
Γ		T/A	С
U			

Permit Application  (Collected under the authority of the Safe to Water Act. Sections 1421, 1422, 40 CFR						ט					T/A	С
Read Attached Instructions Before Starting  For Official Use Only												
Application approved Date received Permit Number			SWINSHINNERS SERVICE	Well ID FINDS Number					Sinceroni			
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City	100, #425	State	ZIP CODE	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	3000 Village Run Road, Unit 103, #223   (724) 444-7501     City   State   ZIP CODE					201		
Wexford		PA	15090		Wexford				PA	150	90	
IV. Commercial Facilit	у	Ownership		V.	. Legal Contact				/II. SIC Codes			
Yes No		Private Federal Other	ral Operator			1389 - Oil and Gas Field Services, Not Elsewhere Classified						
			VIII. W	ell Statu	s- (Mark "x")	7			and the state of the state of			125000
A Date Started												
IX. Typs of Permit Requested (Mark "x" and specify if required)												
A. Individual  B. Area    Number of Existing Wells   1   1   1   1   1   1   1   1   1			ells Nu	umber of Propo	Smith-Ras Unit #1							
			X, Class and	Type of	Well (see revi	irse)	7					
, ,	100	. If class is '	other" or typ	oe is cod	e 'x,' explain	D.	. Number o	f wells pe	r type (if area	permit,	}	
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(Complete the following questions on a separate sheet(s) and number accordingly; see instructions)  For Classes I, II, III, (and other classes) complete and submit on a separate sheet(s) Attachments AU (pp 2-6) as appropriate. Attach maps where required. List attachments by letter which are applicable and are included with your application.												
XIV. Certification												
I certify under the penalty of law that i have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)												
A. Name and Title (Type or Print)  Karl Kimmich, President				F		~ *** *******	· Andrews	ne No. <i>(Area</i>	Code a	nd No.)	7	
Karl Kimmich, President (724) 444-7501  C. Signature D. Date Signed							$\dashv$					

# **Well Class and Type Codes**

Class I Wells used to inject waste below the deepest underground source of drinking

water.

Type "I" Nonhazardous industrial disposal well

"M" Nonhazardous municipal disposal well

"W" Hazardous waste disposal well injecting below USDWs

"X" Other Class I wells (not included in Type "I," "M," or "W")

Class II Oil and gas production and storage related injection wells.

Type "D" Produced fluid disposal well

"R" Enhanced recovery well

"H" Hydrocarbon storage well (excluding natural gas)

"X" Other Class II wells (not included in Type "D," "R," or "H")

Class III Special process injection wells.

Type "G" Solution mining well

"S" Sulfur mining well by Frasch process

"U" Uranium mining well (excluding solution mining of conventional mines)

"X" Other Class III wells (not included in Type "G," "S," or "U")

Other Classes Wells not included in classes above.

Class V wells which may be permitted under §144.12. Wells not currently classified as Class I, II, III, or V.

# **Attachments to Permit Application**

# Class Attachments

I new well A, B, C, D, F, H – S, U existing A, B, C, D, F, H – U

If new well

A, B, C, E, G, H, M, Q, R; optional – I, J, K, O, P, U
existing

A, E, G, H, M, Q, R, – U; optional – J, K, O, P, Q

III new well A, B, C, D, F, H, I, J, K, M – S, U existing A, B, C, D, F, H, J, K, M – U

Other Classes To be specified by the permitting authority

## **INSTRUCTIONS - Underground Injection Control (UIC) Permit Application**

Paperwork Reduction Act: The public reporting and record keeping burden for this collection of information is estimated to average 224 hours for a Class I hazardous well application, 110 hours for a Class I non-hazardous well application, 67 hours for a Class III well application, and 132 hours for a Class III well application. Burden means the total time, effort, or financial resource expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to the collection of information; search data sources; complete and review the collection of information; and, transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques to Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave., NW, Washington, DC 20460. Include the OMB control number in any correspondence. Do not send the completed forms to this address.

This form must be completed by all owners or operators of Class I, II, and III injection wells and others who may be directed to apply for permit by the Director.

- I. EPA I.D. NUMBER Fill in your EPA Identification Number. If you do not have a number, leave blank.
- II. OWNER NAME AND ADDRESS Name of well, well field or company and address.
- III. OPERATOR NAME AND ADDRESS Name and address of operator of well or well field.
- IV. COMMERCIAL FACILITY Mark the appropriate box to indicate the type of facility.
- V. OWNERSHIP Mark the appropriate box to indicate the type of ownership.
- VI. LEGAL CONTACT Mark the appropriate box.
- VII. SIC CODES List at least one and no more than four Standard Industrial Classification (SIC) Codes that best describe the nature of the business in order of priority.
- VIII. WELL STATUS Mark Box A if the well(s) were operating as injection wells on the effective date of the UIC Program for the State. Mark Box B if wells(s) existed on the effective date of the UIC Program for the State but were not utilized for injection. Box C should be marked if the application is for an underground injection project not constructed or not completed by the effective date of the UIC Program for the State.
- IX. TYPE OF PERMIT Mark "Individual" or "Area" to indicate the type of permit desired. Note that area permits are at the discretion of the Director and that wells covered by an area permit must be at one site, under the control of one person and do not inject hazardous waste. If an area permit is requested the number of wells to be included in the permit must be specified and the wells described and identified by location. If the area has a commonly used name, such as the "Jay Field," submit the name in the space provided. In the case of a project or field which crosses State lines, it may be possible to consider an area permit if EPA has jurisdiction in both States. Each such case will be considered individually, if the owner/operator elects to seek an area permit.
- X. CLASS AND TYPE OF WELL Enter in these two positions the Class and type of injection well for which a permit is requested. Use the most pertinent code selected from the list on the reverse side of the application. When selecting type X please explain in the space provided.
- XI. LOCATION OF WELL Enter the latitude and longitude of the existing or proposed well expressed in degrees, minutes, and seconds or the location by township, and range, and section, as required by 40 CFR Part 146. If an area permit is being requested, give the latitude and longitude of the approximate center of the area.
- XII. INDIAN LANDS Place an "X" in the box if any part of the facility is located on Indian lands.
- XIII. ATTACHMENTS Note that information requirements vary depending on the injection well class and status. Attachments for Class I, II, III are described on pages 4 and 5 of this document and listed by Class on page 2. Place EPA ID number in the upper right hand corner of each page of the Attachments.
- XIV. CERTIFICATION All permit applications (except Class II) must be signed by a responsible corporate officer for a corporation, by a general partner for a partnership, by the proprietor of a sole proprietorship, and by a principal executive or ranking elected official for a public agency. For Class II, the person described above should sign, or a representative duly authorized in writing.

EPA Form 7520-6 Page 3 of 6

#### **INSTRUCTIONS - Attachments**

Attachments to be submitted with permit application for Class I, II, III and other wells.

- A. AREA OF REVIEW METHODS Give the methods and, if appropriate, the calculations used to determine the size of the area of review (fixed radius or equation). The area of review shall be a fixed radius of 1/4 mile from the well bore unless the use of an equation is approved in advance by the Director.
- B. MAPS OF WELL/AREA AND AREA OF REVIEW Submit a topographic map, extending one mile beyond the property boundaries, showing the injection well(s) or project area for which a permit is sought and the applicable area of review. The map must show all intake and discharge structures and all hazardous waste treatment, storage, or disposal facilities. If the application is for an area permit, the map should show the distribution manifold (ifapplicable) applying injection fluid to all wells in the area, including all system monitoring points. Within the area of review, the map must show the following:

#### Class I

The number, or name, and location of all producing wells, injection wells, abandoned wells, dry holes, surface bodies of water, springs, mines (surface and subsurface), quarries, and other pertinent surface features, including residences and roads, and faults, if known or suspected. In addition, the map must identify those wells, springs, other surface water bodies, and drinking water wells located within one quarter mile of the facility property boundary. Only information of public record is required to be included in this map;

#### Class II

In addition to requirements for Class I, include pertinent information known to the applicant. This requirement does not apply to existing Class II wells;

#### Class III

In addition to requirements for Class I, include public water systems and pertinent information known to the applicant.

CORRECTIVE ACTION PLAN AND WELL DATA - Submit a tabulation of data reasonably available from public records or otherwise known to the applicant on all wells within the area of review, including those on the map required in B, which penetrate the proposed injection zone. Such data shall include the following:

#### Class I

Adescription of each well's types, construction, date drilled, location, depth, record of plugging and/or completion, and any additional information the Director may require. In the case of new injection wells, include the corrective action proposed to be taken by the applicant under 40 CFR 144.55.

#### Class II

In addition to requirement for Class I, in the case of Class II wells operating over the fracture pressure of the injection formation, all known wells within the area of review which penetrate formations affected by the increase in pressure. This requirement does not apply to existing Class II wells.

#### Class III

In addition to requirements for Class I, the corrective action proposed under 40 CFR 144.55 for all Class III wells.

D. MAPS AND CROSS SECTION OF USDWs - Submit maps and cross sections indicating the vertical limits of all underground sources of drinking water within the area of review (both vertical and lateral limits for Class I), their position relative to the injection formation and the direction of water movement, where known, in every underground source of drinking water which may be affected by the proposed injection. (Does not apply to Class II wells.)

EPA Form 7520-6

- E NAME AND DEPTH OF USDWs (CLASS II) For Class II wells, submit geologic name, and depth to bottom of all underground sources of drinking water which may be affected by the injection.
- F. MAPS AND CROSS SECTIONS OF GEOLOGIC STRUCTURE OF AREA Submit maps and cross sections detailing the geologic structure of the local area (including the lithology of injection and confining intervals) and generalized maps and cross sections illustrating the regional geologic setting. (Does not apply to Class II wells.)
- GEOLOGICAL DATA ON INJECTION AND CONFINING ZONES (Class II) For Class II wells, submit appropriate geological data on the injection zone and confining zones including lithologic description, geological name, thickness, depth and fracture pressure.
- H. OPERATING DATA Submit the following proposed operating data for each well (including all those to be covered by area permits): (1) average and maximum daily rate and volume of the fluids to be injected; (2) average and maximum injection pressure; (3) nature of annulus fluid; (4) for Class I wells, source and analysis of the chemical, physical, radiological and biological characteristics, including density and corrosiveness, of injection fluids; (5) for Class II wells, source and analysis of the physical and chemical characteristics of the injection fluid; (6) for Class III wells, a qualitative analysis and ranges in concentrations of all constituents of injected fluids. If the information is proprietary, maximum concentrations only may be submitted, but all records must be retained.
- FORMATION TESTING PROGRAM Describe the proposed formation testing program. For Class I wells the program must be designed to obtain data on fluid pressure, temperature, fracture pressure, other physical, chemical, and radiological characteristics of the injection matrix and physical and chemical characteristics of the formation fluids.

For Class II wells the testing program must be designed to obtain data on fluid pressure, estimated fracture pressure, physical and chemical characteristics of the injection zone. (Does not apply to existing Class II wells or projects.)

For Class III wells the testing must be designed to obtain data on fluid pressure, fracture pressure, and physical and chemical characteristics of the formation fluids if the formation is naturally water bearing. Only fracture pressure is required if the program formation is not water bearing. (Does not apply to existing Class III wells or projects.)

- J. STIMULATION PROGRAM Outline any proposed stimulation program.
- K. INJECTION PROCEDURES Describe the proposed injection procedures including pump, surge, tank, etc.
- L. CONSTRUCTION PROCEDURES Discuss the construction procedures (according to §146.12 for Class I, §146.22 for Class II, and §146.32 for Class III) to be utilized. This should include details of the casing and cementing program, logging procedures, deviation checks, and the drilling, testing and coring program, and proposed annulus fluid. (Request and submission of justifying data must be made to use an alternative to packer for Class I.)
- M. CONSTRUCTION DETAILS Submit schematic or other appropriate drawings of the surface and subsurface construction details of the well.
- N. CHANGES IN INJECTED FLUID Discuss expected changes in pressure, native fluid displacement, and direction of movement of injection fluid. (Class III wells only.)
- O. PLANS FOR WELL FAILURES Outline contingency plans (proposed plans, if any, for Class II) to cope with all shut-ins or wells failures, so as to prevent migration of fluids into any USDW.
- P. MONITORING PROGRAM Discuss the planned monitoring program. This should be thorough, including maps showing the number and location of monitoring wells as appropriate and discussion of monitoring devices, sampling frequency, and parameters measured. If a manifold monitoring program is utilized, pursuant to §146.23(b)(5), describe the program and compare it to individual well monitoring.
- Q. PLUGGING AND ABANDONMENT PLAN Submit a plan for plugging and abandonment of the well including: (1) describe the type, number, and placement (including the elevation of the top and bottom) of plugs to be used; (2) describe the type, grade, and quantity of cement to be used; and (3) describe the method to be used to place plugs, including the method used to place the well in a state of static equilibrium prior to placement of the plugs. Also for a Class III well that underlies or is in an exempted aquifer, demonstrate adequate protection of USDWs. Submit this information on EPA Form 7520-14, Plugging and Abandonment Plan.

EPA Form 7520-6

- R. NECESSARY RESOURCES Submit evidence such as a surety bond or financial statement to verify that the resources necessary to close, plug or abandon the well are available.
- S. AQUIFER EXEMPTIONS If an aquifer exemption is requested, submit data necessary to demonstrate that the aquifer meets the following criteria: (1) does not serve as a source of drinking water; (2) cannot now and will not in the future serve as a source of drinking water; and (3) the TDS content of the ground water is more than 3,000 and less than 10,000 mg/l and is not reasonably expected to supply a public water system. Data to demonstrate that the aquifer is expected to be mineral or hydrocarbon production, such as general description of the mining zone, analysis of the amenability of the mining zone to the proposed method, and time table for proposed development must also be included. For additional information on aquifer exemptions, see 40 CFR Sections 144.7 and 146.04.
- T. **EXISTING EPA PERMITS** List program and permit number of any existing EPA permits, for example, NPDES, PSD, RCRA, etc.
- U. DESCRIPTION OF BUSINESS Give a brief description of the nature of the business.

EPA Form 7520-6 Page 6 of 6

Section 1 – Area of Review Methods/Calculations



45610 Woodland Road, Suite 400, Sterling, VA 20166 703-444-7000 703-444-1685 (FAX)

## TECHNICAL MEMORANDUM

TO: Dale Skoff, Tetra Tech OGA

**FROM:** Jeffrey Benegar

**DATE:** February 4, 2015

**RE:** Area of Review/Zone of Endangerment Analysis for Bittinger #3 and Smith-Ras #1

Wells - Bear Lake Properties

#### **EXECUTIVE SUMMARY**

This technical memorandum (TM) summarizes the analytical modeling we have performed for the area of review/zone of endangerment analysis for the Bittinger #3 and Smith-Ras #1 wells. The scenarios involved injecting simultaneously at existing Bear Lake Properties UIC Class IID brine disposal wells Bittinger #1, #4, and #2, all of which are located in Columbus Township, Warren County, Pennsylvania (the Bittinger #1 and Bittinger #4 wells received their final UIC Class IID (Commercial) well permits in November 2012 and Bittinger #2 in late 2014). The relevant parameters for our analysis were obtained from Bear Lake Properties, LLC or estimated in the absence of any information. Our analysis is described in more detail below.

#### OVERVIEW AND METHODOLOGY

There are several methods proposed for calculating the zone of endangerment of an injection well. The most simplistic method is the use of a fixed radius, based on the type of injection well being permitted. Other methods involve calculation of the radius based on well and formation properties. Most regulatory agencies require the use of calculations to determine the zone of endangerment. The method used here is the graphical method first used by US EPA Region 6. It involves the calculation of the increase of pressure in the formation due to injection, then converting that pressure into equivalent feet of head. The increase in head in the formation due to injection is then compared to the equivalent head of the lowest most underground source of drinking water (USDW). When plotted graphically, the intersection of those two curves at some distance, r, determines the radius of the zone of endangerment.

The increase in pressure in the formation due to injection depends on the properties of the injection fluid and the formation, the rate of fluid injection, and the length of time of injection. The most common mathematical expression to describe this increase in pressure was developed

by Matthews and Russell (1967). Matthews and Russell assume that, for a single well injecting into an infinite, homogeneous and isotropic, non-leaking formation, the increase in pressure (delta p) can be described as:

delta p = 162.6 Q $\mu$  / kh \* [(log(kt /  $\Phi\mu$ Cr<sup>2</sup>) – 3.23] where:

delta p = pressure change (psi) at radius, r and time, t

Q = injection rate (barrels/day)

 $\mu$  = injectate viscosity (centipoise)

k = formation permeability (millidarcies)

h = formation thickness (feet)

t = time since injection began (hours)

C = compressibility (total, sum of water and rock compressibility) (psi<sup>-1</sup>)

r = radial distance from wellbore to point of investigation (feet)

 $\Phi$  = average formation porosity (decimal)

### PARAMETERS USED IN THE ANALYSIS

The following parameters were used in the zone of endangerment analysis. For injection rate, we used the average daily rate based on the permitted monthly rate for the three existing permitted Bear Lake Properties UIC Class IID wells, which is 30,000 bbls/month for each well, which averages approximately 1,000 bbls/day per well. For permeability, we used a value of 50 md, which we feel is conservative based on the injection rate sustainable for existing disposal wells at the site and the substantial volume of natural gas produced from the reservoir, both of which indicate significant permeability. The initial pressure at the top of the injection formation was based upon measurements taken prior to injection at the Bittinger #4 well.

# Bittinger #3 Medina Group Well

Q = 1000 barrels/day

t = 10 years = 87,600 hours

 $\mu = 1$  centipoise

k = 50 md

h = 61 feet

 $C = 3.0e-06 \text{ psi}^{-1}$ 

 $\Phi = 0.08$ 

Specific gravity of injectate = 1.218

Surface elevation = 1638 feet

Depth to injection formation = 4260 feet

Base of lowest most USDW (MSL) = 1338 feet

Initial pressure at top of injection formation = 128 psi

#### Smith-Ras #1 Medina Group Well

Q = 1000 barrels/day

t = 10 years = 87,600 hours

 $\mu = 1$  centipoise

k = 50 md

h = 61 feet

 $C = 3.0e-06 \text{ psi}^{-1}$ 

 $\Phi = 0.08$ 

Specific gravity of injectate = 1.218

Surface elevation = 1575 feet

Depth to injection formation = 4222 feet

Base of lowest most USDW (MSL) = 1275 feet

Initial pressure at top of injection formation = 128 psi

# Bittinger #2 Medina Group Well

Q = 1000 barrels/day

t = 10 years = 87,600 hours

 $\mu = 1$  centipoise

k = 50 md

h = 61 feet

 $C = 3.0e-06 \text{ psi}^{-1}$ 

 $\Phi = 0.08$ 

Specific gravity of injectate = 1.218

Surface elevation = 1621 feet

Depth to injection formation = 4279 feet

Base of lowest most USDW (MSL) = 1321 feet

Initial pressure at top of injection formation = 128 psi

# Bittinger #1 Medina Group Well

Q = 1000 barrels/day

t = 10 years = 87,600 hours

 $\mu = 1$  centipoise

k = 50 md

h = 61 feet

 $C = 3.0e-06 \text{ psi}^{-1}$ 

 $\Phi = 0.08$ 

Specific gravity of injectate = 1.218

Surface elevation = 1518 feet

Depth to injection formation = 4210 feet

Base of lowest most USDW (MSL) = 1218 feet

Initial pressure at top of injection formation = 128 psi

#### Bittinger #4 Medina Group Well

Q = 1000 barrels/day

t = 10 years = 87,600 hours

 $\mu = 1$  centipoise

k = 50 md

h = 61 feet

 $C = 3.0e-06 \text{ psi}^{-1}$ 

 $80.0 = \Phi$ 

Specific gravity of injectate = 1.218

Surface elevation = 1561 feet

Depth to injection formation = 4285 feet Base of lowest most USDW (MSL) = 1261 feet Initial pressure at top of injection formation = 128 psi

#### RESULTS

The Matthews and Russell equation was solved for various distances from the wellbore based on the parameters listed above. The distance between each of the wells is:

Wells	Distance (ft)
Bittinger #3 to Bittinger #2	2,052
Bittinger #3 to Bittinger #4	3,566
Bittinger #3 to Bittinger #1	3,779
Smith-Ras #1 to Bittinger #2	1,714
Smith-Ras #1 to Bittinger #4	2,584
Smith-Ras #1 to Bittinger #1	2,180
Smith-Ras #1 to Bittinger #3	1,980
Bittinger #1 to Bittinger #4	1,300
Bittinger #1 to Bittinger #2	2,000
Bittinger #2 to Bittinger #4	1,600

The Matthews and Russell equation was used to calculate the increase in pressure in the formation with only one well injecting. This was done for all five wells. Then, the calculated pressures for each well were added together and this sum was added to the value of existing pressure in the injection formation to obtain the total pressure in the formation when all five wells are injecting.

These values were then converted to feet of head of formation brine. The values are plotted against distance from the wellbore and are shown in Figure 1 for the Bittinger #3 well and Figure 2 for the Smith-Ras #1 well. The plot shows the calculated pressure surface within the injection formation, measured as feet of head of formation brine above the top of the injection formation. Also shown is the head of the lowest most USDW. Where the two lines intersect, the radius of the zone of endangerment can be estimated. The results indicate that the increase in head in the formation due to injection will intersect the elevation of the lowestmost USDW at a distance of approximately 4 feet for the Bittinger #3 well and approximately 60 feet for the Smith-Ras #1 well. These distances are well within the ¼ mile standard fixed radius for area of review/zone of endangerment.

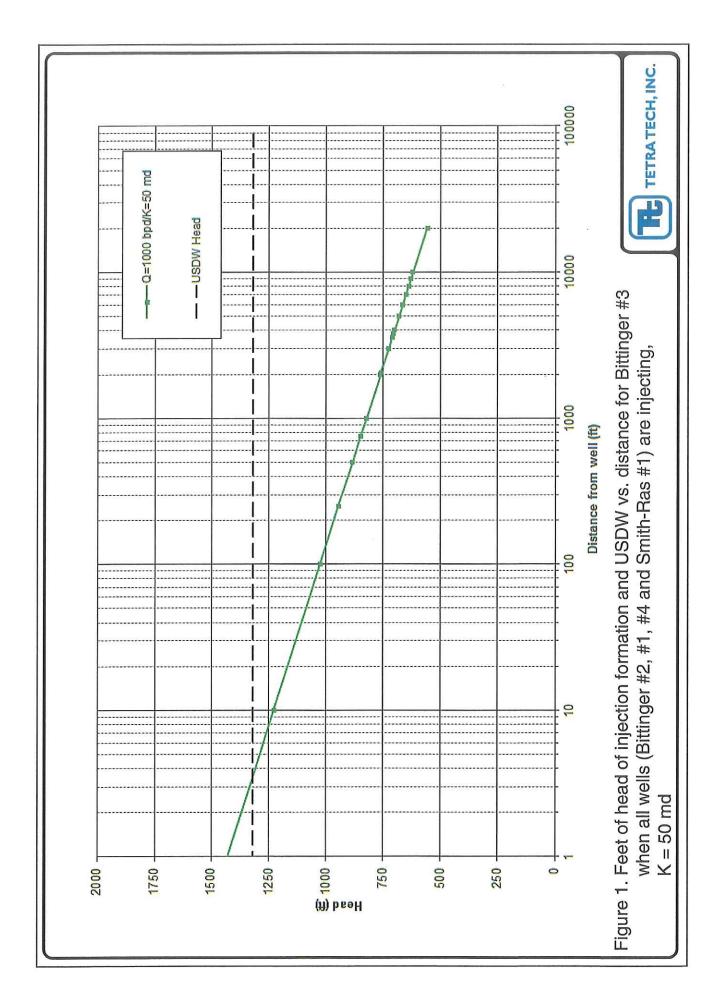
#### **CONCLUSIONS**

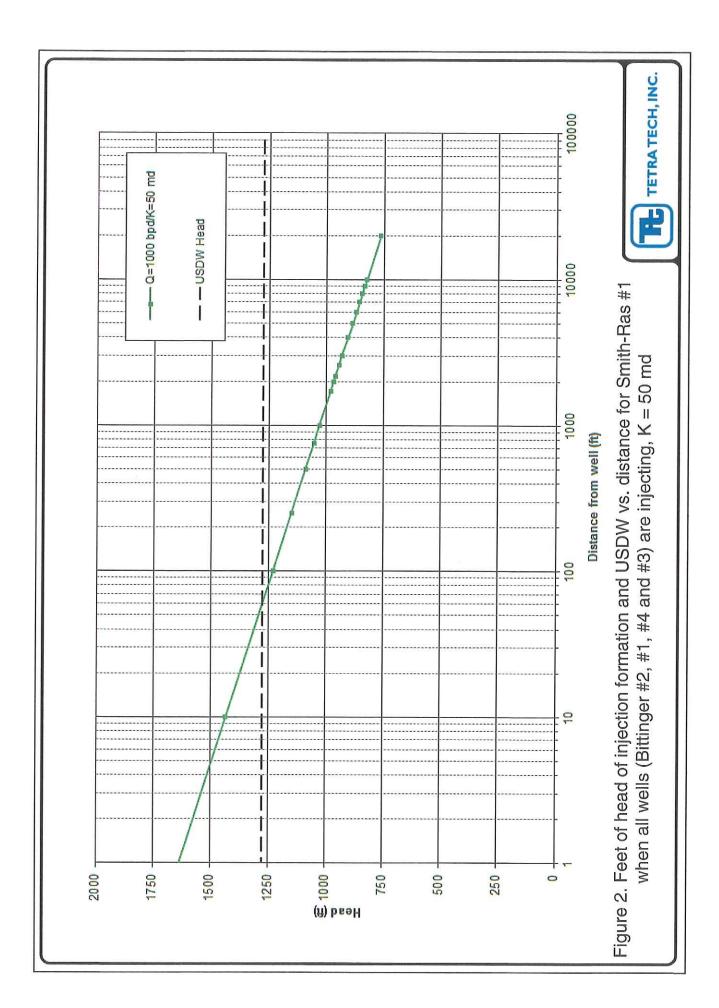
Our analysis of the area of review/zone of endangerment for the Bittinger #3 and Smith-Ras #1 wells (injecting together with the Bittinger #2, #4, and #1 wells) is based on a methodology typically used by US EPA. Based on the results, we believe the Bittinger #3 and Smith-Ras #1 wells are excellent candidates for use as brine disposal wells. The increase in head in the formation due to injection intersects the elevation of the lowestmost USDW well within ½ mile

for each well. The standard fixed radius of ¼ mile can be used for the area of review/zone of endangerment for the Bittinger #3 and Smith-Ras #1 wells.

# REFERENCES

Matthews, C.S., Russell, D.G., (1967) Pressure Buildup and Flow Tests in Wells, SPE Monograph Series, Volume 1, New York.





Section 2 - Maps of Well Area and Area of Review

#### Section 2 - Maps of Well Area and Area of Review

According to publicly available records in the area, there are no intake or discharge structures, hazardous waste treatment, storage, or disposal facilities, mines, or quarries within one mile of the Smith-Ras Unit #1 well. An intermittent unnamed tributary (UNT) to Tamarack Swamp is located approximately 0.5 mile west of the Smith-Ras Unit #1 well. Tamarack Swamp is located approximately 0.75 mile southwest, Brokenstraw Creek is located approximately 1 mile northwest, and an UNT to Pine Valley Creek is located approximately 0.25 miles east of the Smith-Ras Unit #1.

The Pennsylvania Geologic Survey "Ground Water Inventory System" (GWIS) database was accessed to determine whether there were any water wells listed for the site area. The review found that there were no water wells listed within the quarter mile AOR. It is noted that the well reporting requirement was established in 1968 and is not considered to be a complete record of water wells and other wells may be present. (Pennsylvania Topographic and Geologic Survey, September 15, 2010). One well was identified within the AOR based on public input and a foot survey by Bear Lake Properties staff. Attached are a map showing the location of the above-referenced well and a table summarizing information on the well.

The names and addresses of residents located within ¼ mile of the proposed injection well are provided in Appendix A.

Wells Located Within the 1/4 Mile Radius Area of Review (AOR) For The Smith-Ras Unit #1 Well

					Drilling			
Well Owner / Name	API#	Lat	Long	Œ	Completed	Last Csg	Csg depth	Completion
		Oil ar	Oil and Gas and Proposed Injection Wells	posed Injection	Wells .			
Bear Lake Properties Smith-Ras Unit #1								
(Proposed InjectionWell)	123-34843	41.992727	41.992727	4516 ft	3/26/1984	4.5 in	4493 ft	Perf'd and frac'd
			Water	Water Wells				
Jack McCoy	N/A	41.992867	41.992867 -79.534883					

AREA OF REVIEW MAPS
OIL AND GAS WELLS

AREA OF REVIEW MAPS GROUNDWATER WELLS

Section 3 - Corrective Action Plan and Well Data

#### Section 3 - Corrective Action Plan and Well Data

According to publicly available records of oil and gas wells and a survey conducted by foot, there are no existing, or plugged and abandoned wells within a ¼ mile radius AOR for the Smith-Ras Unit #1 well. The D. Wright #1 and the T. Reed #4 will be used as monitoring wells. If the fluid level in either monitoring well is observed to rise up to within 100 feet of the base of the USDW, disposal operations in the Smith-Ras Unit #1 well will be stopped immediately, EPA will be notified, and operating conditions will be evaluated in order to control the fluid levels.

### Existing Oil and Gas Wells within the Area of Review

Well completion records are required to be submitted for all wells located within the area of review in order to evaluate the need for corrective action specific to each well. As mentioned above, there are no oil and gas wells located with the AOR.

#### **Plugged and Abandoned Wells**

No plugged and abandoned wells have been identified within the ¼ mile AOR for the Smith-Ras Unit #1 well.

Section 4 - Name and Depth of USDWs

#### Section 4 - Underground Sources of Drinking Water (USDW)

The site lies within the Glaciated Plateau section of the Appalachian Plateaus Physiographic province. Both unconsolidated glacial units and bedrock are used for potable water. The uppermost unit at the site is mapped as Wisconsin age glacial kame deposits. Kame deposits consist primarily of sand and gravel interbedded with minor amounts of silt and clay (Pennsylvania Topographic and Geologic Survey, 1959). The well log for Smith-Ras #1 indicates that unconsolidated gravel is present from the surface to a depth of 120 feet below ground surface.

The uppermost bedrock beneath the site is mapped as the Devonian age Venango formation. The Venango formation consists of interbedded pebble conglomerate, crossbedded sandstone, siltstone, and shale. This unit is up to 330 feet thick in Venango County; however, only a portion of the unit is present in the site area. This unit is used as an aquifer throughout Warren County. The well log for Smith-Ras #1 indicates that Devonian age shale is present from 120 ft to a depth of 2,768 ft below ground surface. This is believed to include the Venango Formation, the Chadokoin formation, and the underlying Bradford Group. Wells deeper than approximately 100 feet deep usually encounter salt water, which is supported by the generally shallow well depths in Columbus Township. (PADER, 1982, US Geologic Survey, 2007)

The Devonian age Chadakoin formation underlies Venango formation and consists of finegrained marine clastics (siltstone and shale) and includes a purplish pink sequence which is often used as a marker unit. This unit is up to 450 thick in Warren County.

The Pennsylvania Geologic Survey "Ground Water Inventory System" (GWIS) database was accessed to determine whether there were groundwater wells included for the site area. This database did not contain any groundwater wells within a one-quarter mile radius of Smith-Ras #1 well. Although there are no wells listed, the well reporting requirement was established in 1968 is not considered to be a complete record of water wells and other wells may be present. (Pennsylvania Topographic and Geologic Survey, September 15, 2010). One water well was identified within the AOR based on public input and a foot survey by Bear Lake Properties staff. Section 2 of this application includes a map showing the location of the above-referenced well and a table summarizing information on the well.

Based on the available information, the glacial units and the top 100 feet of bedrock is considered the underground sources of drinking water in the site area. The well logs indicate that the glacial material is approximately 120 feet thick beneath the site. Freshwater is expected to be encountered to a depth of approximately 100 feet with increasing salinity beyond that depth. The Smith-Ras #1 well has 8 5/8 inch surface casing cemented to a depth of 406 feet below ground surface, providing a buffer of approximately 300 feet beyond the base of the underground sources of drinking water based on the well data in Columbus Township (maximum well depth of 130 feet) and the references indicating brine being encountered at depths over 100 feet within the bedrock units. In addition, production casing extends several thousands of feet below the drinking water source and is cemented approximately 1300 feet above the injection interval. (Injection well construction is described in detail in the "Well Construction" section.)

In calculating the depth to the base of the lowermost USDW, the depth of the deepest well in the area 130 feet (it is believed that the generally shallow well depth in the area was related to water quality issues based on the available literature) was doubled and rounded upward to the nearest

100 feet, providing a conservative maximum depth estimate of the underground source of drinking water of 300 feet.

#### References:

Pennsylvania Topographic and Geologic Survey, 1959. "Glacial Geology of Northwestern, PA." Bulletin G 32.

Pennsylvania Topographic and Geologic Survey, 1981. "Atlas of Preliminary Quadrangle Maps of Pennsylvania, PA." Map 61.

PADER, 1982. "Engineering Characteristics of the Rocks of Pennsylvania". Environmental Geology Report 1.

Pennsylvania Topographic and Geologic Survey, September 15/20, 2010. "Ground Water Inventory System". <a href="https://www.dcnr.state.pa.us/topogeo/groundwater/PAGWIS">www.dcnr.state.pa.us/topogeo/groundwater/PAGWIS</a>

US Geologic Survey, 2007. "Ground-Water Resources and the Hydrologic Effects of Petroleum Occurrence and Development, Warren County, Northwestern Pennsylvania." Scientific Investigations Report 2006-5263.

### UNDERGROUND SOURCES OF DRINKING WATER BEDROCK MAP

### UNDERGROUND SOURCES OF DRINKING WATER GLACIAL MAP

Section 5 – Geologic Data On Injection and Confining Zones

#### Section 5 – Geologic Data on Injection and Confining Zones

The well is designed to inject into the Grimsby and Whirlpool sandstone units of the Medina Group which occurs at depths between 4,222 and 4,396 feet below grade in the Smith-Ras Unit #1 well. The Medina is a depleted reservoir in this area.

As seen on the generalized stratigraphic column (attached), most of the geologic "groups" and "formations" overlying the Medina can be considered confining units totaling approximately 2,000 feet. Although many of these units are predominantly shale, they also contain reservoir rock and are shown with shading in confining unit column. Therefore, the Lockport and the Salina are seen as the most significant confining units and have a combined thickness of over 600 feet in the site area. As indicated, these units provide only a portion of the confining capacity and there are numerous other units that provide further protection.

The characteristics of the Medina Group formations including the Grimsby and Whirlpool are described in the attached report prepared by Billman Geologic Consultants entitled, "Geologic Review of the Bittinger Area, Planned SWD Site", dated August 2, 2010, and the cover letter dated April 5, 2014 discussing the Bittinger #2 well geologic characteristics. The subject report includes cross-sections in the vicinity of the Smith-Ras Unit #1 well. As demonstrated by the cross-sections, the formation characteristics (lithology, thickness, porosity, etc.) of the Medina Group rocks in the Smith-Ras Unit #1 well are very similar to those of the nearby wells including the three permitted brine disposal wells (Bittinger #1, #2 and #4 wells) operated by Bear Lake Properties.

Also attached are the following:

- Smith-Ras Unit #1 completion record and geophysical log,
- Maximum Injection Pressure (MIP) calculations based on Instantaneous Shut-In Pressure (ISIP) data for the Smith-Ras Unit #1 well
- Smith-Ras Unit #1 treatment reports.

#### Potential for Faults and Seismicity

As discussed in the attached Billman Geologic Consultants Report, geologic mapping performed at the Bear Lake Properties site as part of natural gas exploration and development in the Medina Group sandstone units has not identified evidence of significant faulting (e.g., duplicated intervals evident in log analysis, unusual thickening or thinning of intervals, etc.). Likewise the production of large volumes of natural gas from the Medina Group indicates the lack of significant faults which would allow for migration of the entrapped gas out of the Medina.

It is also noted that the Medina Group wells at the site are largely depleted resulting in lower than natural rock pressures. Production data for the Smith-Ras Unit #1 are summarized on the attached table along with six other nearby wells. Cumulative gas production from the Smith-Ras Unit #1 well is approximately 217 MMCF. Total production from all seven wells is over 1.75 BCF. The impact of removal of this large volume of gas is, as expected, a decrease in reservoir pressure. Injecting brine at or below the proposed maximum injection pressure would therefore not likely result in "overpressuring" faults (if any do exist in the area) and causing movement.

Finally, it is highly unlikely that injection at the site would engage any deep, Pre-Cambrian basement faults. According to the PA DCNR "Precambrian Basement Map of the Appalachian Basin and Piedmont Province in Pennsylvania" <a href="http://www.dcnr.state.pa.us/cs/groups/public/documents/document/dcnr\_016250.pdf">http://www.dcnr.state.pa.us/cs/groups/public/documents/docum

basement in the site vicinity is estimated at approximately 2,500 meters (or 8,200 feet) below sea level. The base of the Medina Group at the Bear Lake Properties site is approximately 2,800 ft. below sea level, or approximately a mile above Pre-Cambrian basement.

A review of the PA DCNR "Earthquake Epicenters in and Near Pennsylvania" (attached) indicates that there have been no recorded seismic events within 25 miles of the disposal project area since 1724, the start of the reporting period.

In summary, a detailed review of the zone of injection and data on geologic strata surrounding the zone of injection for the proposed brine disposal well, indicates the following supporting evidence that seismicity is highly unlikely: 1) The detailed geologic cross-sections (Appendix 2 of the Billman Geologic Consultants Report) and isopach and structural mapping completed by Billman Geologic Consultants show no evidence of faulting in the study area. 2) Historic production of over 1.75 billion cubic feet of gas among the Bittinger #1, #2, #3 and #4, Smith Ras #1 and Trisket #1 and #2 wells and unknown volumes of formation brine from the proposed zone of injection near the Bittinger #3 has depleted the zone of almost 90% of its original reservoir pressure. The disposal operations will re-fill this void space over the life of the project. 3) There have been no recorded seismic events within 25 miles of the disposal project area since 1724, the start of the reporting period referenced in the PA DCNR earthquake epicenters map.

### GEOLOGIC DATA BILLMAN GEOLOGIC CONSULTANTS REPORT

### GEOLOGIC DATA GENERALIZED STRATIGRAPHIC COLUMN

# Generalized Stratigraphic Column Smith-Ras Unit #1 Warren County, PA

Age	Group	Formation	Predominant	Total Depth	Thickness	Confining
			Rock Type	to Base(Feet)	Feet	Zone
Glacial Units				120	120	
Upper Devonian	Venango		Shale/sandstone			
Upper Devonian		Chadakoin	Shale			
Upper Devonian	Bradford		Shale			
Upper Devonian	타		Shale	2766	0770	
Upper Devonian		Java	Shale	7100	0407	
Upper Devonian		West Fails	Shale			
Upper Devonian		Sonyea	Shale			
Upper Devonian		Genesee	Shale			
Upper Devonian		Tully Limestone	Limestone	2877	109	
Upper Devonian	Hamilton	Hamilton Mahantango	Shale, some sandstone	3040	Ę	
Upper Devonian	Hamilton	Hamilton Marcellus Shale	Shale	Ct-OC	7/7	
Middle Devonian		Onondaga	Limestone	3218	169	
		Unconformity Interval		3233	15	
Upper Silurian		Salina - including Akron-Berite, Camillus, Syracuse, Vernon	Evaporites/Dolomite	3785	552	
Upper Silurian		Lockport Dolomite	Dolomite	3861	76	
Lower Silurian	Clinton	Rochester Shale, Irondequoit-Reynales Dolomite	Sandstone	4222	122	
Lower Silurian		Medina, inlcuding the Grimsby and Whirlpool Sandstones	Sandstone/Shale	4396	174	

### Notes

= Black shading Indicates that this unit is considered to be a confining zone = Diagonal shading Indicates that this unit is a confining unit that also contains producing zones within it

= No shading indicates that this unit is a producing zone and is not considered to be a confining unit

### GEOLOGIC DATA SMITH-RAS UNIT #1 COMPLETION RECORD

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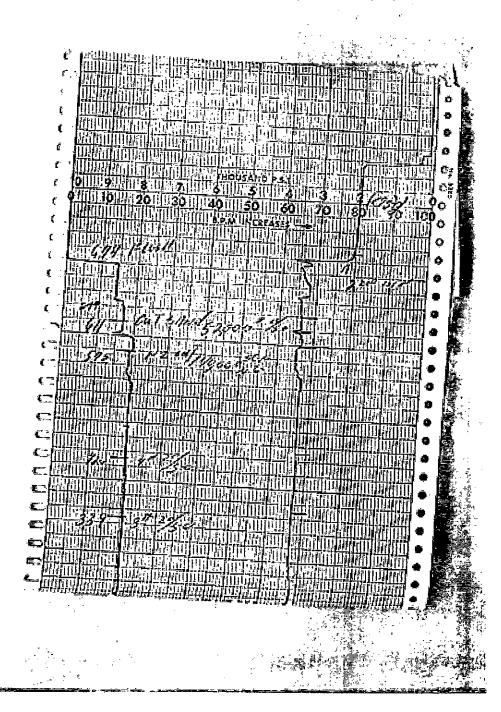
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Unconformity Interval	32181	3233'				
Akron-Bertie	32331	3317'				
Camillus	33171	33891				
Syracuse	33891	3597 '				
Vernon	35971	3861'				
Salt Zone	35791	37851				
Lockport	3861	4065		}	Salt @ 3910'	
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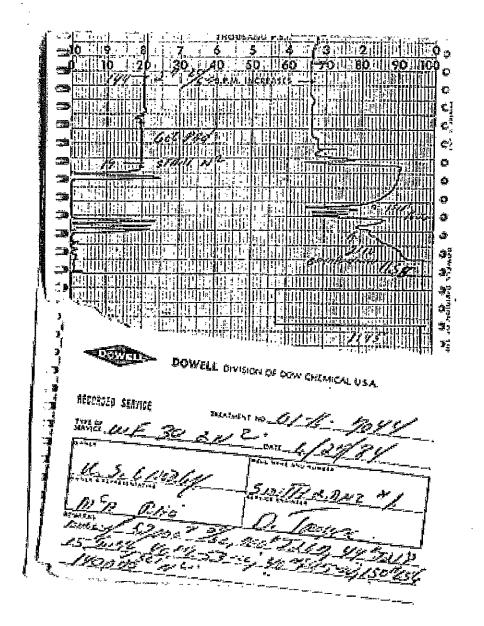
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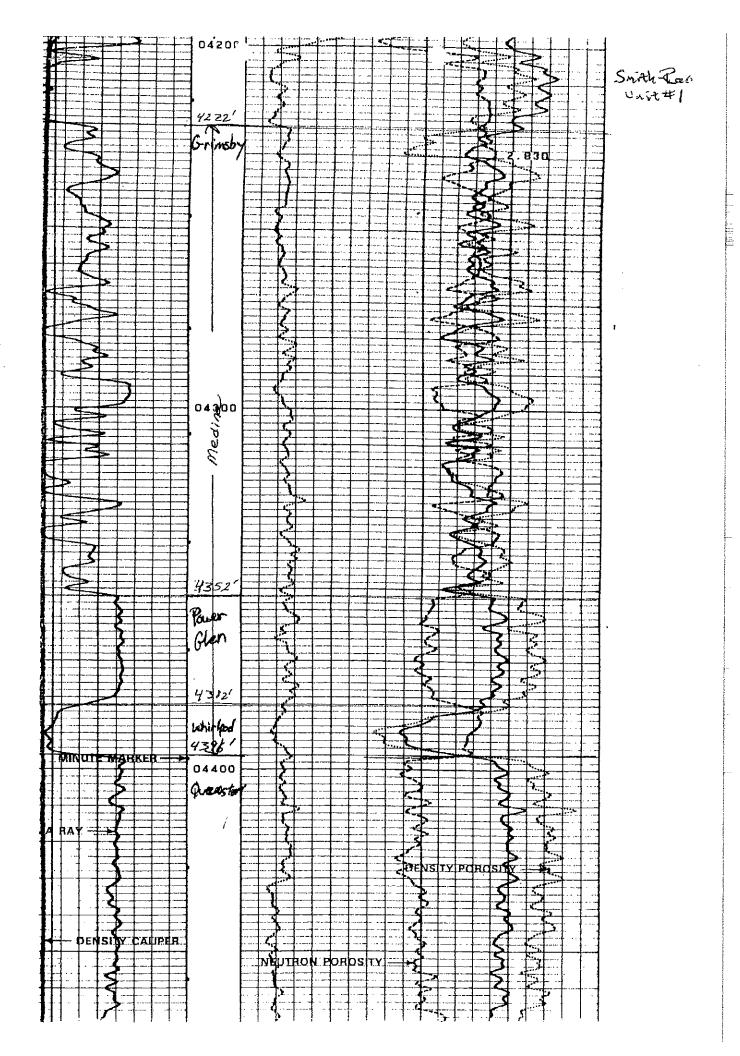
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### GEOLOGIC DATA MAXIMUM INJECTION PRESSURE CALCULATIONS

### Maximum Injection Pressure (MIP) Calculations for Bear Lake Properties Smith-Ras Unit #1 Well

Warren County, PA

#### 1) Frac Gradient (FG) Based on Smith-Ras Unit #1 Well Frac

FG = [ISIP + (.433 X SG X D)] /D Where: ISIP = 2200 psi SG = 1.0 (frac fluid) D = 4391

				Fracture
	Hydrostatic			Gradient
ISIP (psi)	Factor (psi/ft)	SG	D (ft)	(psi/ft)
2200	0.433	1	4391	0.934

#### 2) Maximum Injection Pressure (MIP) Calculation for Smith-Ras Unit #1 Well

MIP = [FG - (.433XSG)] X D FG = 0.934 SG = 1.218 (brine)

Depth:

Medina Top 4222

			Fracture	
Hydrostatic			Gradient	
Factor (psi/ft)	SG	D (ft)	(psi/ft)	(Surface)
0.433	1.218	4222	0.934	1717

### GEOLOGIC DATA MEDINA WELL GAS PRODUCTION SUMMARY

Permit Company	Year	Product	Quantity (MCE)	Brine	Dave	County	Municipality	Mamo Name	Carro Mell Ma	Plois	-	
344	1984	545	_			NA/APPEN	SITURALIS	IOSEBLI BITTINICED		DI Javan I CO	ממנייים כל אניייים מ	20 In St
	1985	SAS	27.00			WANDEN	COLUMBUS	JOSEPH BITTINGER	۷ ۲	COLUMBUS	DEWEY CORNERS	29-Jan-84
	1986	SAS	30,101		9	WAYA DOUN	COLUMBUS	DOSEPH BITTINGER	7 (	COLUMBUS	DEWET CORNERS	29-Jan-84
	1987	2 0	02,00		- 5	WAYADDEN!	COLUMBUS	JOSEPH BITTINGEN	<b>7</b> [	COLUMBUS	DEWEY CORNERS	29-Jan-84
	1088	טעט	27,472 370 71		× 3	WARREN WAYABBEN	COLUMBUS	JOSEPH BITTINGER	7 (	COLUMBUS	DEWEY CORNERS	29-Jan-84
	1989	GAS	50.332		3 25	WARREN	COLUMBUS	JOSEPH BITTINGER	<b>4</b> (	COLUMBUS	DEWEY CORNERS	29-Jan-84 70 Jan 84
	1990	GAS	39,609		0.53	WARREN	COLLIMBUS	IOSEPH BITTINGER	<b>1</b> C	COLUMBUS	DEWEL CORNERS	40-11PC-67
	1991	GAS	22,223		× 55	WAAPPEN	COLUMBIA	JOSEPH BITTINGED	<b>4</b> (	COLUMBUS	DEWET CORNERS	29-Jan-84
	1997	200	6 351			WANDEN	COLUMBUS	JOSEPH BITTINGER	7 (	COLUMBUS	DEWEY CORNERS	29-Jan-84
	1993	GAS	5000			WARREN	COLUMBUS	JOSEPH BITTINGER	<b>7</b> (	COLUMBUS	DEWEY CORNERS	29-Jan-84
	1994	RRINE		22		WANDEN	COLUMBIS	JOSEPH BITTINGER	<b>4</b> (	COLUMBUS	DEWEY CORNERS	29-Jan-84
	1994	GAS	1.402	1	319 W	WARREN	COLUMBUS	IOSEPH RITTINGER	1 (	COLUMBUS	DEWET CORNERS	29-Jan-64
	2000	GAS	869			WARREN	COLLIMBIIS	IOSEPH BITTINGER	1 6	COLUMBUS	DEWEL CONNERS	70 121 00
	2001	GAS	29		0.50	WARREN	COLUMBUS	JOSEPH BITTINGER	1 6	COLUMBUS	DEWEL CORNERS	29-Jall-64
	2002	GAS	0		1150	WARREN	COLUMBUS	IOSEPH BITTINGER	10	COLUMBUS	DEWEY CORNERS	29-Jan-84
123-33944 BELDEN & BLAKE CORP	2002	OIL	0		80 58	WARREN	COLUMBUS	IOSEPH BITTINGER	1 6	COLUMBUS	DEWEL CORNERS	29-Jan-64
	2002	GAS	· Lo			WARREN	COLUMBIS	IOSEPH BITTINGER	1 6	COLIMBUS	DEWEL CORNERS	20-Jan 94
123-33944 RANGE RESOURCES APPALACHIA LLC	2003	GAS	701		4	WARREN	COLUMBUS	IOSEPH BITTINGER	1 0	COLIMBIS	DEWEY CORNERS	29-Jan 84
	2004	GAS	718			WARREN	COLUMBUS	IOSEPH BITTINGER	1 0	COLUMBUS	DEWEY CORNERS	29 Jan 94
	2005	GAS	670			MARREN	COLLIMBIIS	IOSEDH BITTINGED	1 (	COLUMBIS	DEWEL CONNERS	40-11a1-64
	2006	GAS	374		8 150	WARREN	COLUMBUS	IOSEPH BITTINGER	۷ ر	COLUMBUS	DEWEY CORNERS	29-Jan-84 20 Jan 84
	2007	GAS	102			WARREN WAR	COLUMBUS	JOSEPH BITTINGER	<b>4</b> C	COLUMBUS	DEWEY CORNERS	29-Jan-84
	2002	2 0	193			WARAEN WAYADDEN	COLUMBUS	JOSEPH BILLINGER	7 (	COLUMBUS	DEWEY CORNERS	29-Jan-84
	2000	3 6	190			AKKEN	COLUMBUS	JOSEPH BIT IINGER	7 -	COLUMBUS	DEWEY CORNERS	29-Jan-84
	5003	CAS L	30	,	30 N	WAKKEN	COLUMBUS	JOSEPH BITTINGER	2	COLUMBUS	DEWEY CORNERS	29-Jan-84
		lotal	55,055	7								
Permit Company	Year	Product	Quantity		Days C	County	Municipality	Farm Name	Farm Well No	Field	Pool	Completion Date
123-33945 US ENERGY DEV CORP	1986	GAS	32,248		336 W	WARREN	COLUMBUS	JOSEPH BITTINGER	l m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1987	GAS	36,330		336 W	WARREN	COLUMBUS	JOSEPH BITTINGER	m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1988	GAS	48,995			WARREN	COLUMBUS	JOSEPH BITTINGER	m	COLUMBUS	DEWEY CORNERS	19-Ort-84
123-33945 US ENERGY DEV CORP	1989	GAS	42,806		332 W		COLUMBUS	JOSEPH BITTINGER	m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1990	GAS	26,642				COLUMBUS	JOSEPH BITTINGER	) m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1991	GAS	13,848				COLUMBUS	JOSEPH BITTINGER	) m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1992	GAS	5,278		1000		COLUMBUS	JOSEPH BITTINGER	) m	COLLIMBLIS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1993	GAS	4,826		360 M		COLUMBUS	JOSEPH BITTINGER	ı m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1994	BRINE		73	>		COLUMBUS	JOSEPH BITTINGER	n	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 US ENERGY DEV CORP	1994	GAS	1,810		363 W	WARREN	COLUMBUS	JOSEPH BITTINGER	m	COLUMBUS	DEWEY CORNERS	19-Oct-84
123-33945 BELDEN & BLAKE CORP	2001	GAS	99		365 W	WARREN	COLUMBUS	JOSEPH BITTINGER	8	COLUMBUS	DEWEY CORNERS	19-Oct-84
	2002	GAS	40		365 W	WARREN	COLUMBUS	JOSEPH BITTINGER	e	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
	2002	OIL	0		<i>&gt;</i>	WARREN	COLUMBUS	JOSEPH BITTINGER	ന	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
	2005	GAS	0		× 0	WARREN	COLUMBUS	JOSEPH BITTINGER	ю	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
	2005	OIL	0		<i>&gt;</i>	WARREN	COLUMBUS	JOSEPH BITTINGER	m	COLUMBUS	DEWEY CORNERS	19-Oct-84
	2006	GAS	0		3	WARREN	COLUMBUS	JOSEPH BITTINGER	9	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
	2006	OIL	0		s 0	WARREN	COLUMBUS	JOSEPH BITTINGER	e	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
	2008	GAS	0		<i>&gt;</i>	WARREN	COLUMBUS	JOSEPH BITTINGER	m	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
123-33945 BELDEN & BLAKE CORP	2008	OIL	0		3	WARREN	COLUMBUS	JOSEPH BITTINGER	n	COLUMBUS	<b>DEWEY CORNERS</b>	19-Oct-84
		Total	212,890	73								
Permit Company	Year	Product	Quantity		Davs C	County	Municipality	Farm Name	Farm Well No	Field	lood	Completion Date
123-39273 US ENERGY DEV CORP	1985	GAS				z	COLUMBUS	R TRISKET	1	COLUMBUS	DEWEY CORNERS	14-Dec-84
										10 hacked and access	OF Silling COSTON Statement and analysis	

123-39273 US ENERGY DEV CORP	1987 1988 1989 1990 1991 1992 2000 2001 2001 2002 2003 2005 2005 2006 2007 2007 2007 2007	GAS GAS GAS GAS GAS GAS GAS GAS GAS GAS	26,012 34,866 60,104 29,211 6,338 3,309 1,474 5,19 1,166 1,166 1,166 1,166 1,073 1,073 1,485 1,485 1,068	322 307 335 335 293 321 165 240 365 365 365 365 365 365 365 365 365 365		WARREN COWARREN COWAR	COLUMBUS COL	R TRISKET	аннаннынныннын п	SOTUMBUS SOLUMBUS SOL	DEWEY CORNERS	14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84 14-Dec-84
123-39874 US ENERGY DEV CORP 123-39874 BELDEN & BLAKE CORP 123-39874 BELDEN & BLAKE CORP 123-39874 BELDEN & BLAKE CORP 123-39874 BELDEN & BLAKE CORP 123-39874 RANGE RESOURCES APPALACHIA LLC 123-39874 RANGE RESOURCES APPALACHIA LLC 123-39874 RANGE RESOURCES APPALACHIA LLC 123-39874 RANGE RESOURCES APPALACHIA LLC 123-39874 LION ENERGY CO LLC 123-39874 LION ENERGY CO LLC 123-39874 LION ENERGY CO LLC	Year 1987 1988 1989 1990 1991 1994 1994 2000 2001 2002 2002 2002 2005 2005 2005	Product GAS GAS GAS GAS GAS GAS GAS GAS GAS GAS	Quantity 11,653 110,800 1100,800 1100,330 60,844 35,401 13,041 6,946 5,778 92 21 55,1 55,1 79 30,8 32 338 32 336,487	11.1 3.5 3.5 3.6 3.6 3.6 3.6 3.6 3.6 3.6 3.6 3.6 3.6	× 2 2 2 4 8 0 1 8 8 8 2 4 2 8 0	County WARREN  WARR	Municipality COLUMBUS	Farm_Name BITTINGER	Farm_Well_No	ETITLE COLUMBUS COLUM	Peol DEWEY CORNERS	Completion Date 20-Aug-87
Permit Company 123-40751 US ENERGY EXPLORATION CORP 123-40751 US ENERGY DEV CORP 123-40751 US ENERGY DEV CORP 123-40751 US ENERGY DEV CORP	Year 1990 1991 1992	Product GAS GAS GAS GAS	Quantity 41,981 47,292 25,943 17,584		315 WA 315 WA 357 WA 322 WA 359 WA	County WARREN C WARREN C WARREN C WARREN C	Municipality COLUMBUS COLUMBUS COLUMBUS	Farm_Name R. TRISKET R. TRISKET R. TRISKET R. TRISKET	Farm_Well_No 2 2 2 2	Field COLUMBUS I COLUMBUS I COLUMBUS I	Pool DEWEY CORNERS DEWEY CORNERS DEWEY CORNERS DEWEY CORNERS	Completion Date 5-Jan-90 5-Jan-90 5-Jan-90 5-Jan-90

	1994	BRINE		137			COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	1994	GAS	19,177		363		COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2000	BRINE		2		WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	<b>DEWEY CORNERS</b>	5-Jan-90
	2000	GAS	5,514		366 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2001	BRINE		17	_	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2001	GAS	4,531		365	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2002	GAS	2,340		273 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2002	OIF	0		0	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2002	GAS	205		31	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2003	BRINE		45	365 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	<b>DEWEY CORNERS</b>	5-Jan-90
	2003	GAS	1,594		365	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2004	GAS	1,422		365 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2002	GAS	1,554		365 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
	2006	GAS	1,414		365	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
123-40751 TRINITY ENERGY CORP	2007	GAS	278		122	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
123-40751 LION ENERGY CO LLC	2008	GAS	869		365 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
123-40751 LION ENERGY CO LLC	2009	GAS	1,506	200	365 \	WARREN CO	COLUMBUS	R. TRISKET	2	COLUMBUS	DEWEY CORNERS	5-Jan-90
				2								
	Year	Product	Quantity		Days (	County Mu	Municipality	Farm_Name	Farm Well No	Field	Pool	Completion Date
123-34843 US ENERGY DEV CORP	1985	GAS	17,683		0	WARREN CO	COLUMBUS	SMITH- RAS	Н	COLUMBUS	DEWEY CORNERS	26-Mar-84
123-34843 US ENERGY DEV CORP	1986	GAS	31,402		336 \	WARREN CO	COLUMBUS	SMITH- RAS	1		DEWEY CORNERS	26-Mar-84
123-34843 US ENERGY DEV CORP	1987	GAS	29,357		322	WARREN CO	COLUMBUS	SMITH- RAS	н	NAME OF THE OWNER, OF THE OWNER, OF THE OWNER, OF THE OWNER, OWNER, OWNER, OWNER, OWNER, OWNER, OWNER, OWNER,	DEWEY CORNERS	26-Mar-84
123-34843 US ENERGY DEV CORP	1988	GAS	50,639		338 \	WARREN CO	COLUMBUS	SMITH- RAS	-		DEWEY CORNERS	26-Mar-84
123-34843 US ENERGY DEV CORP	1989	GAS	52,016		344 \			SMITH- RAS			DEWEY CORNERS	26-Mar-84
123-34843 US ENERGY DEV CORP	1990	GAS	21,148		- 59 - 120			SMITH- RAS			DEWEY CORNERS	26-Mar-84
123-34843 US ENERGY DEV CORP	1991	GAS	8.423					SMITH- RAS	i e		DEWEL COLLINERS	20-Ivial-04
	1997	246	1 513					ON THE PASS	-1 t		EWEY CORNERS	26-Mar-84
	1000	2 0	1,010 000 0					SIVILIH- KAS	п,		DEWEY CORNERS	26-Mar-84
	1001	2 0	2,000		702			SMITH- KAS	п,		DEWEY CORNERS	26-Mar-84
	1000	2 6	ייין איין		3 5			SIMILH- KAS			DEWEY CORNERS	26-Mar-84
	2002	GAS	770					SMITH- RAS	-		DEWEY CORNERS	26-Mar-84
123-34843 LION ENERGY CO LLC	5007	GAS	644		365 \	WARREN CO	COLUMBUS	SMITH- RAS	1	COLUMBUS	DEWEY CORNERS	26-Mar-84
		Total	216,965									
123-33914 US ENERGY DEV CORP	1984	GAS	5893		,	WARREN CO	COLUMBUS	JOSEPH BITTINGER	Т	COLUMBUS	DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1985	GAS	14431.49		<i>&gt;</i>	WARREN CO	COLUMBUS	JOSEPH BITTINGER	н		DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1986	GAS	44172.28		336 \	WARREN CO	COLUMBUS	OSEPH BITTINGER	н		DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1987	GAS	21594.73		336 \	WARREN CO	COLUMBUS	IOSEPH BITTINGER	1	COLUMBUS	DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1988	GAS	51243.65		356 V	WARREN CO	COLUMBUS	OSEPH BITTINGER	н		DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1989	GAS	67741.18		364 V	WARREN CO	COLUMBUS	IOSEPH BITTINGER	н		DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1990	GAS	66748.67		352 V	WARREN CO	COLUMBUS	IOSEPH BITTINGER	Н		DEWEY CORNERS	29-Dec-83
123-33914 US ENERGY DEV CORP	1991	GAS	38209		350 V	WARREN CO	COLUMBUS	JOSEPH BITTINGER	1	COLUMBUS	DEWEY CORNERS	29-Dec-83
	1992	GAS	13492		320 V	WARREN CO	COLUMBUS	IOSEPH BITTINGER	н	COLUMBUS	DEWEY CORNERS	29-Dec-83
	1993	GAS	9029		352 V	WARREN CO	COLUMBUS	IOSEPH BITTINGER	1		DEWEY CORNERS	29-Dec-83
	1994	GAS	2570		341 V	WARREN CO	COLUMBUS	IOSEPH BITTINGER	1	COLUMBUS	DEWEY CORNERS	29-Dec-83
	2000	GAS	559		366 V	WARREN CO	COLUMBUS	OSEPH BITTINGER	1	COLUMBUS	DEWEY CORNERS	29-Dec-83
	2001	GAS	438		365 V	WARREN CO	COLUMBUS	IOSEPH BITTINGER	1	COLUMBUS	DEWEY CORNERS	29-Dec-83
	2002	GAS	372		273 V	3	COLUMBUS	OSEPH BITTINGER	н	COLUMBUS	DEWEY CORNERS	29-Dec-83
	2002	이	0		40		COLUMBUS	IOSEPH BITTINGER	1		DEWEY CORNERS	29-Dec-83
	2002	GAS	46				.5	OSEPH BITTINGER	1		DEWEY CORNERS	29-Dec-83
123-33914 RANGE RESOURCES APPALACHIA LLC	2003	GAS	257.85		182 V	WARREN COI	COLUMBUS	JOSEPH BITTINGER	1	COLUMBUS	DEWEY CORNERS	29-Dec-83

COLUMBUS DEWEY CORNERS 29-Dec-83	COLUMBUS DEWEY CORNERS 29-Dec-83	COLUMBUS DEWEY CORNERS 29-Dec-83	COLUMBUS DEWEY CORNERS 29-Dec-83	COLUMBUS DEWEY CORNERS 29-Dec-83	COLUMBUS DEWEY CORNERS 29-Dec-83	COLUMBUS DEWEY CORNERS 29-Dec-83	
Н	1	1	7	ы	ы	r-i	
244 WARREN COLUMBUS JOSEPH BITTINGER 1	JOSEPH BITTINGER	JOSEPH BITTINGER 1	JOSEPH BITTINGER	WARREN COLUMBUS JOSEPH BITTINGER 1	JOSEPH BITTINGER	JOSEPH BITTINGER	
LUMBUS	WARREN COLUMBUS	WARREN COLUMBUS	LUMBUS	LUMBUS	WARREN COLUMBUS	WARREN COLUMBUS	
EN CO	EN CO	EN CO	EN CO	EN CO	EN S	EN CO	
WARR		WARR	WARR	WARR	WARR		
244	212	151	365		365	120	
				38			38
313.84	47.28	4.33	64		392	96	334,886
GAS	GAS	GAS	GAS	BRINE	GAS	GAS	Total
2004	2002	2006	2007	2008	2008	2009	
23-33914 RANGE RESOURCES APPALACHIA LLC	23-33914 RANGE RESOURCES APPALACHIA 1LC	23-33914 RANGE RESOURCES APPALACHIA LLC	23-33914 TRINITY ENERGY CORP	123-33914 HON ENERGY CO LLC	23-33914 LION ENERGY CO LLC	23-33914 LION ENERGY CO LLC	

Total All 7 wells 1,751,614

## GEOLOGIC DATA EARTHQUAKE EPICENTERS MAP (PA DCNR)

