

Dear Sirs and Madams at the Department of Environmental Protection,

Please accept the following comment on the (API-105-21374) Clara 20 injection well permit application.

On 5/27/22 the DEP oil and gas well inspector inspected the Clara 20 well and at the time of the inspection took the following photo.



The image above is a crop of a [photo](#) that is attached to this [Inspection Record No.3369547](#).

At the time the inspector noted that the department received an application from the operator to convert the Clara 20 well from an active gas well into an injection well. During the inspection the inspector photographed the well, a rusty barrel, misc pipes and other un-used equipment littering the Clara 20 well site.

It's important to note that the oil and gas well inspector did not issue any notices of violations at the time of the May 27, 2022 inspection.

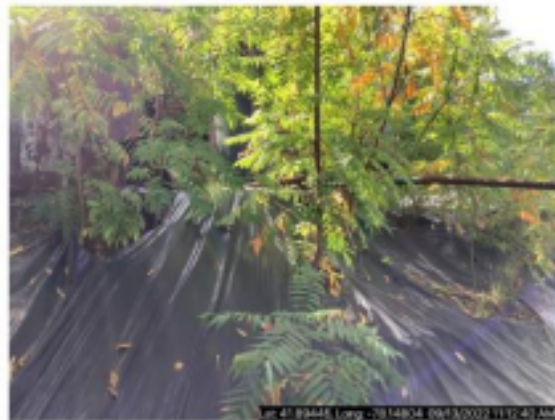
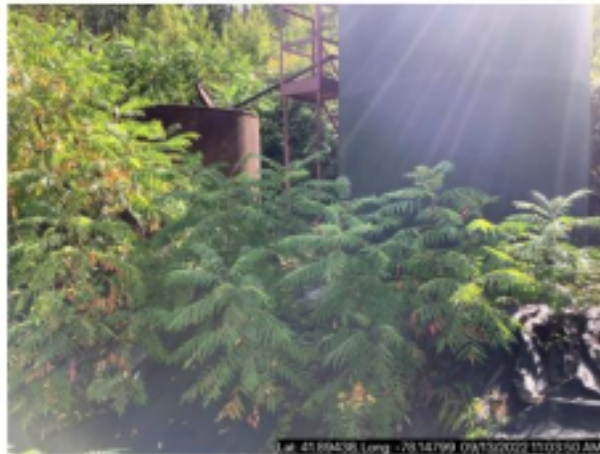
Four months later, on 9/13/2022 the DEP Environmental Protection **Compliance Specialist** inspected the Clara 20 well. At the time of that inspection it was noted in the inspection report that 'vegetation' was growing through holes in liner of the secondary containment surrounding Roulette Oil and Gas Co., LLC's tank battery next to the Clara 20 well.

The inspection Record No. 3422460 is available online here:

[https://drive.google.com/file/d/1R2OCnTMPKVAz\\_K2VPJe4QAJK9MjCnzZN/view?usp=sharing](https://drive.google.com/file/d/1R2OCnTMPKVAz_K2VPJe4QAJK9MjCnzZN/view?usp=sharing) The

Compliance Specialist did not issue any notices of violations at the time of the 9/13/2022 inspection.

The lushness of the botanical garden (shown in DEP's inspection images below), growing through the gaping holes in the secondary containment's plastic liner and the un-used equipment littering the well site shows the operator has been poorly maintaining the well site for quite some time.



#: 5

Tanks labeled brine, no indication of tank volumes.

#: 6

Plastic liner under tanks with vegetation growing through liner material.

Images above are from DEP's Record No. 3422460 online here:

[https://drive.google.com/file/d/1R2OCnTMPKVAz\\_K2VPJe4QAJK9MiCnzZN/view?usp=sharing](https://drive.google.com/file/d/1R2OCnTMPKVAz_K2VPJe4QAJK9MiCnzZN/view?usp=sharing)

g The following are crops from that inspection report:

Site inspection conducted to review field conditions at the Clara Field 20 well (API # 105-21374). The Department received a permit application to change the use of the Clara Field 20 well from a gas production well to a Class II-D injection disposal well for brine. There are no Roulette O&G personnel on site at time of inspection. Weather conditions are partly sunny and 61 degrees F.

As part of the permit application, a Control and Disposal Plan was submitted by Strat Resources for Roulette O&G. The Control and Disposal Plan outlines the pollution prevention measures and emergency response planning that will be undertaken by Roulette O&G once the injection well becomes operational. The C&D plan also contains a list of emergency supplies for the site and Safety Data Sheets (SDS) for any chemicals that may be used on site.

The Clara Field 20 well area was observed to be **overgrown with vegetation** during this inspection. Brine tanks on site are located within lined, earthen dikes. The liner for the upper tank and lower tank batteries **appears to have holes and vegetation growing through the material** (photo 4&6). Precipitation within liners was measured for electrical conductivity. No elevated conductivity readings were observed on site. **The Department recommends that all existing liners be removed and replaced with a more durable product which meets the Department requirements of §78.56.** Tanks appear to be in good condition.

**There are no violations noted.**

Waste Control & Disposal	1: Oil / Condensate Tanks Containment: Oil / Condensate Tanks Containment	<b>Inspection Remark:</b> One steel 80 barrel oil tank is located on site. Tank is set up within earthen dike with plastic liner.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
	1: Production Fluids Control & Storage : Production Fluids Control & Storage	<b>Inspection Remark:</b> Four plastic tanks are located on site. One plastic separator tank, and three 100 barrel brine storage tanks. <b>Tank volumes are not listed on tanks.</b> Tanks appear to be in fair condition (photos 3-5).	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
	1: Temporary Storage:	<b>Inspection Remark:</b> One 500 barrel frac tank is set up within an earthen dike along the site access road (photo 7). <b>The Department recommends labeling the tank for contents.</b>	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>
	1: Well Site Secondary Containment:	<b>Inspection Remark:</b> <b>Plastic liner membrane is installed under tank batteries. Liner material has perforations and vegetation growing through holes</b> (photos 3, 4&6).	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/>

The compliance inspector recommended labeling the tanks and noted the plastic liner has perforations and vegetation growing through the holes.

A year later, on 04/18/2023 oil and gas well inspector returned to the site and re-inspected the Clara 20 well and tank battery according to Inspection Record No. 3540396. That inspection report is online here:

[https://drive.google.com/file/d/1Yy7fB5PGCK-OT\\_SObjYHukGfXWTknSc9/view?usp=sharing](https://drive.google.com/file/d/1Yy7fB5PGCK-OT_SObjYHukGfXWTknSc9/view?usp=sharing)

Photos taken during the April 18, 2023 inspection show that the trees that were growing through the liner were cut down.

The liner was not replaced and Roulette Oil and Gas was not cited for any violations during the April 18, 2023 inspection.

The status of the Clara 20 well is currently **active**.



Images above are from the 04/18/2023 DEP inspection No. 3540396.

Recently, on 7/10/2023 the oil and gas inspector returned to inspect the well. ([Inspection Record No. 3581571](#))

The following is a crop from the [photo](#) taken during that inspection:



And it looks like the liner with the holes in it has not been replaced:





The operator was not cited for any violations during the 7/10/2023 inspection. Would you please explain the purpose of this secondary containment?

Is the condition of this **ACTIVE gas well** site and secondary containment around these **waste storage tanks** acceptable?

If the injection well permit is approved would the Clara 20 injection well be inspected on a regular basis? How frequent would inspections take place?

How often are ARG's injection wells in Elk County inspected?

(I ask because some of ARG's injection wells located in the ANF is similar to this site or worse.) Is the DEP considering seeking primacy from the EPA for Class II-D injection wells? I hope not. Do you think the DEP's oversight over oil and gas well operations is adequate and protective of the environment?

Do you think the inspectors that have been inspecting this well site are capable and of providing adequate oversight over an injection well?

Applications received from operators that are not in compliance with regulations and/or have abandoned wells in their inventory should not be eligible for review by department staff. This permit review has been a substantial waste of public funding.

Oil and gas inspectors, **especially compliance specialists**, who are unwilling to issue NOV's , ask operators to remove un used equipment and garbage from their well sites, replace torn liners or construct adequate secondary containments around their tank batteries should be replaced with employees willing to cite violations that they repeatedly observe during inspections.

<https://www.pacodeandbulletin.gov/Display/pacode?file=/secure/pacode/data/025/chapter78a/s78a.64a.html&d=reduce>

Our group is looking forward to having these concerns addressed in the DEP's public comment response document.