

Department of Environmental Protection,
Northwest Oil and Gas District,
230 Chestnut Street,
Meadville, PA 16335
RA-EPOILGASDROPBOX@pa.gov

Dear Messrs & Madams of the Department of Environmental Protection (DEP),
I would like to thank you for the opportunity to comment on the Clara Field #20 pending permit application to convert the gas well into an injection well..

I strongly oppose the proposed injection well project and I'm requesting the DEP deny authorization of the permit based on the following information.

James W. Reynolds and Robert D. Benson have a long history of abandoning wells, including 8 injection wells, while operating them under authorization of EPA UIC Permit No: PAS2R940BPOT, this has been well documented by the Department of Environmental Resources (DER) and Department of Environmental Protection (DEP) dating back to 1984.

Officers of Roulette Oil & Gas Co, LLC have operated wells in Pennsylvania under the business names of the following 4 companies according to records on file with *Department* of Environmental Resources (*DER*), Department of Environmental Protection (DEP), Department of Conservation and Natural Resources and Pennsylvania Department of State

1. Roulette Oil & Gas Co. LLC. (OGO-68607) [Link to Inventory](#).
2. Benson and Reynolds Gas Co.
3. Potter McKean Resources Inc. (OGO-48045). [Link to Inventory](#).
4. Potter McKean Resources of Pennsylvania also identified by DEP as Potter McKean Resources of PA. [Link to Inventory](#).

The companies listed above operated wells that have been identified by the DEP's database as "abandoned."

James Reynolds is the *managing partner* of Roulette Oil & Gas Co.,LLC according to the Oil and Gas Operator Ownership and Control Information form that was filed with the injection well application.



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
OFFICE OF OIL AND GAS MANAGEMENT

**OIL AND GAS OPERATOR
OWNERSHIP AND CONTROL INFORMATION**

PLEASE TYPE OR PRINT

GENERAL OPERATOR INFORMATION		Enter the name and address under which you or your organization operate oil and gas wells in Pennsylvania which must be the same name as is providing the bond.			
Corporate, Company, Partnership or Registered Fictitious Name <i>Roulette Oil + Gas Co. LLC</i>			Type of Organization / Code <i>LLC</i>		Federal Tax ID# <i>45-3083756</i>
Individual or Partner - Last Name <i>Reynolds</i>		First Name <i>James</i>		MI <i>W.</i>	Suffix
Mailing Address <i>1034 Rt 44 N.</i>				<input checked="" type="checkbox"/> Check if this is a new address.	
City <i>Shingle house</i>		State <i>PA.</i>	ZIP+4 <i>16748</i>	Country (If Other Than USA) <i>McKean</i>	
Phone (Daytime) <i>814-697-7891</i>		Ext.	FAX	Email Address <i>jr gasman pa@yahoo.com</i>	
Person to Contact - Last Name <i>Reynolds</i>		First Name <i>James</i>		MI <i>W.</i>	Suffix <i>Managing partner</i>
If the applicant is an individual or partnership operating under a name that is different than your full personal name, the name must be registered as a fictitious name with the Department of State. Please attach a copy of your APPROVED fictitious name registration. <input type="checkbox"/> Registration attached <input type="checkbox"/> Registration previously submitted and still active.					
If the applicant is a domestic or foreign corporation or limited liability company, it must be registered to conduct business in Pennsylvania with the Department of State. Please attach a copy of your APPROVED corporate registration or authorization to conduct business in Pennsylvania. <input type="checkbox"/> Registration attached <input type="checkbox"/> Authorization to conduct business in PA attached <input type="checkbox"/> Registration previously submitted still active					
If the applicant has NO parent company , check the following box. <input checked="" type="checkbox"/> No parent.					
If the applicant has a parent company , include the following information for the parent company: the name of the company					

https://files.dep.state.pa.us/OilGas/BOGM/BOGMPortalFiles/Underground%20Injection%20Wells/Roulette/Section-A_PermitApp_OperatorOwnership_etc/Operator-Ownership-and-Control-documents.pdf

While doing business as Benson & Reynolds Gas Co beginning around 1983 the company received permits to operate 8 injection wells located in Clara and Hebron Townships in Potter County. I requested the Benson & Reynolds files from the DEP and after receiving them I made the files I received for the eight injection wells available online in Google docs at the following link:

https://drive.google.com/drive/folders/1QrbS0k8weZ6RRyLOn_P8IRRFuPcYQOJ1?usp=sharing

These include:

- [POT- 20825 is also identified by DEP records as Matteson 1 Well, API 105-20825](#)
- [POT-20827-R is also identified by DEP records as Matteson 2 Well, API 105-20827](#)
- [POT-20834-R is also identified by DEP records as Matteson 8 Well, API 105-20834](#)
- [POT-20829-R is also identified by DEP records as Matteson 16 Well, API 105-20829](#)
- [POT-20831-R is also identified by DEP records as Matteson 103 Well, API 105-20831](#)
- [POT-20832-R is also identified by DEP records as Matteson 116 Well, API 105-20832](#)
- [POT-20833-R is also identified by DEP records as Matteson 117 Well, API 105-20833](#)
- [POT-20830-R is also identified by DEP records as Matteson 120 Well, API 105-20830](#)

Inspection Reports in DEP files reflect the operators were cited in 1990 and again in 1994 for abandoning the wells. Ownership of the 8 injection wells was transferred to Potter McKean Resources Inc., on June 13, 1994.

The following is a crop of the Matteson 120 Well's inspection report conducted in **1990**.

All 8 wells had been abandoned at the time of the 1990 inspections according to the DEP records.

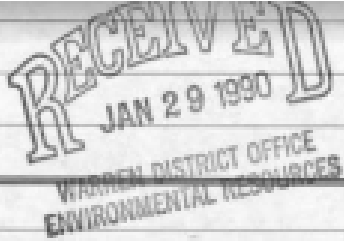
'This well is an abandoned well' is repeated in the inspection notes 8 times.

Remarks: - This well has no permit number on site, permit number needs affixed to well head.
 - This well is venting small amt of gas to atmosphere & site inspection reveals this well has not been connected to line & used since removed in 1984
 - Well status indicates this is an abandoned well, which is a violation of Act 223, Oil & Gas Act

Sample No(s)	Location/Description	Certified Mail No. P093329722 Date Mailed 1-22-90
		Name R Ford OGI-9610
		DER Rep. Richard Ford

The following is a crop of the Matteson 120 Well **1990 Notice of Violation**. All 8 of the well files that I received from the DEP contain similar violations.

county, permitted as 57-105-20850-R.

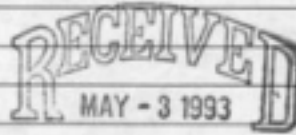


NOTICE OF VIOLATION(S)		
Law	Section	Description/Recommended Action/Correction Taken
Act 223	201 (h)	Well permit number issued by the dept. has not been installed on well in a permanent (legible) manner. "Well permit must be installed on well in a permanent and readable manner."
Act 223	210 (a)	This is an unplugged abandoned well, which definition of abandoned well is in part "...Any well that has not been used to produce, extract or inject any gas, petroleum or other liquid within the preceding 12 months..." This well must be placed into use, plugged, or have an inactive status granted for it.
		Reply within 30 days of receipt of this letter as to how and when this violation was or will be corrected.

Here's a crop of the Matteson 120 Well **1993** inspection. All 8 well files contain inspections that are similar.

Drilling-Plugging		Permit Issue Date _____			
Notification _____	<input type="checkbox"/>	Date Drilling Commenced _____			
B.O.P. _____	<input type="checkbox"/>	Pit Approval Number _____			
Casing _____	<input type="checkbox"/>	Other _____			
Monument _____	<input checked="" type="checkbox"/>	<i>LETTER SENT TO DEP</i>			
<i>Bent Drilling</i>	<input checked="" type="checkbox"/>				
Waste Management		Plugging			
Top Hole Water _____	<input type="checkbox"/>	Filling Material & Plugs	From	To	Casing & Tubing
Drilling Fluids _____	<input type="checkbox"/>				Size
Fracing Fluids _____	<input type="checkbox"/>				Pulled
Production Fluids _____	<input type="checkbox"/>				Left
Impoundments _____	<input type="checkbox"/>				
Pollution Prevention _____	<input type="checkbox"/>				
Residual Waste _____	<input type="checkbox"/>				

Remarks: - abandoned well, well not being produced & not plugged
 - no well tag, permit number issued by Dept. needs to be affixed to well



Berens Oil & Gas Management
Environmental Resources

Sample No(s) _____	Location/Description _____	Certified Mail No. <i>P622373043</i> Date Mailed <i>4-30-93</i>
_____	_____	Name <i>R Ford</i> OGI <i>9610</i>
_____	_____	DER Rep. <i>Richard Ford</i>

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REGIONAL FILE

In addition to being abandoned DEP files reflect that these wells leaked and vented natural gas into the atmosphere for many years.

The Matteson 1 well was *last inspected* onsite by the DEP in 1993 and it may still be venting Green House Gases (GHG) into the atmosphere today.

According to the Pennsylvania Department of State, Potter McKean Resources Inc. was created on 06/01/1994 and the officers according to the Department of State were James W. Reynolds, Robert D. Benson and Peter Metritkas.

<https://www.corporations.pa.gov/search/corpsearch>

Business Name History

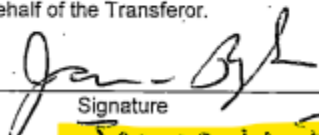
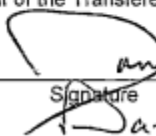
Name	Name Type
POTTER-MCKEAN RESOURCES, INC.	Current Name

Business Entity Details

Name	POTTER-MCKEAN RESOURCES, INC.
Entity Number	2583419
Entity Type	Business Corporation
Status	Active
Citizenship	Foreign
Entity Creation Date	05/01/1994
Effective Date	05/01/1994
State Of Inc	NY
Address	BELL RUN RD SHINGLEHOUSE PA 16748-0 Potter

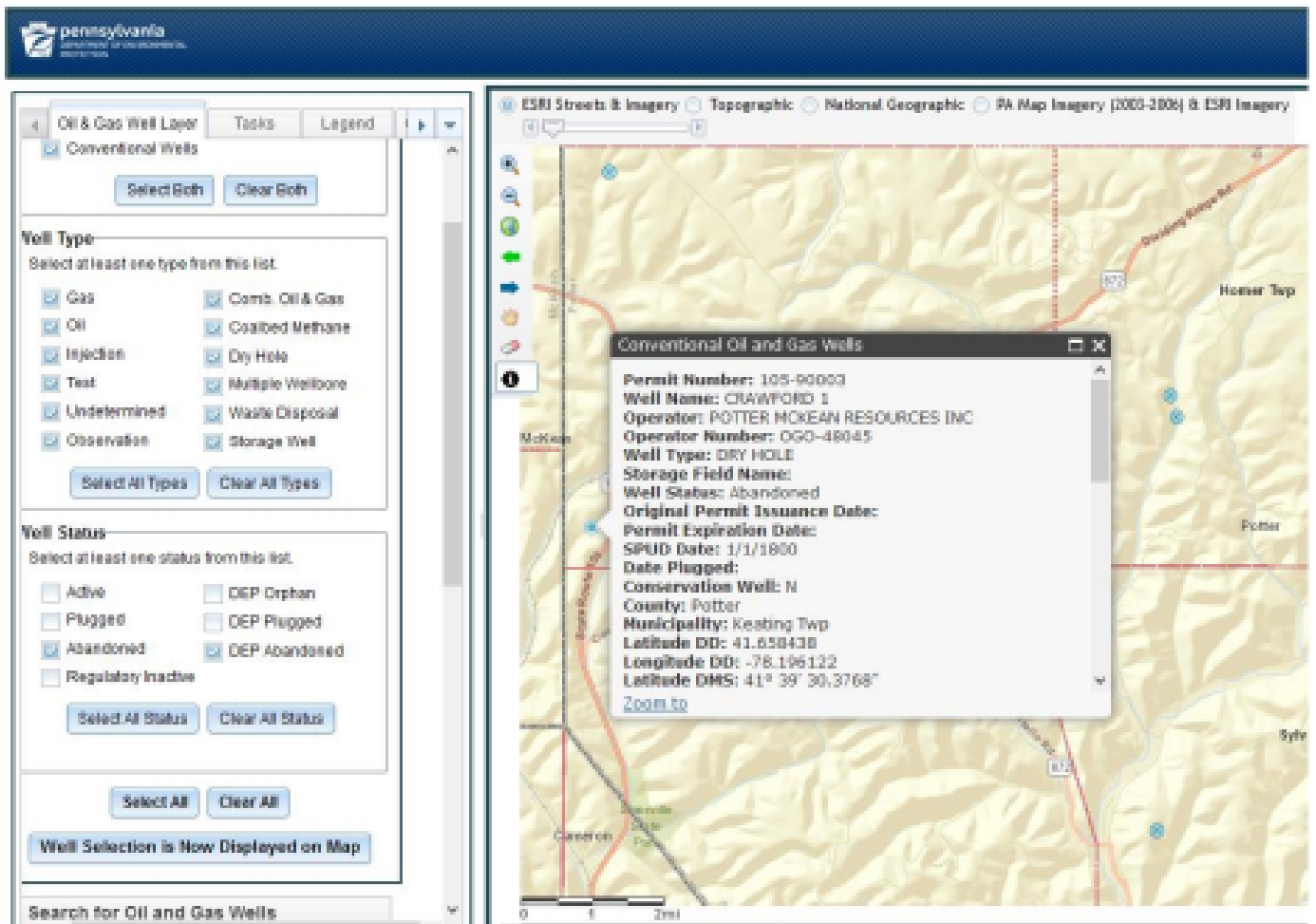
Officers

Name	JAMES W REYNOLDS
Title	SECRETARY
Address	PO BOX 527 SHINGLEHOUSE PA 16748-53
Name	JAMES W REYNOLDS
Title	TREASURER
Address	PO BOX 527 SHINGLEHOUSE PA 16748-53
Name	PETER METRITIKAS
Title	VICEPRESIDENT
Address	PO BOX 527 SHINGLEHOUSE PA 16748-53
Name	ROBERT D BENSON
Title	PRESIDENT
Address	PO BOX 527 SHINGLEHOUSE PA 16748-53

TRANSFER FROM:		TRANSFER TO:	
Name	Potter-McKean Resources of PA	Name	Guardian Explor
Address	P.O. BOX 527	Address	P.O. BOX 225
City	SHINGLEHOUSE	City	HUNT
State	PA	State	
Zip	16748-0527	Zip	
Telephone	814-697-7891	Telephone	830-367-6022
Fax	814-697-6222	Fax	
Bond Number:	9064	Bond Number:	991
SIGNATURES and CERTIFICATION			
Subject to the penalties of Title 18-PA C.S. §4904 relating to unsworn falsification to authorities, I request for transfer of permit or registration for the oil / gas wells listed herein. Further, I certify that the information and attachments is true and correct to the best of my knowledge and information.			
SIGNATURE of Transferor, or Transferor's authorized agent acting on behalf of the Transferor.		SIGNATURE of Transferee acting on behalf of the Transferee.	
 Signature James W. Reynolds (Type or print name and title)		 Signature Robert D. Benson (Type or print name and title)	
Date: 5-24-08		Date: 5-24-08	

DEP records reflect James W. Reynolds and Robert D. Benson, officers of Potter McKean Resources Inc., currently have one well in the company's inventory and that well is identified by DEP's online database as "abandoned."

Crawford 1 Well **API 105-90003** Status is currently **ABANDONED**.



This abandoned well, owned by Potter McKean Resources Inc., is located in Keating Twp., Potter County here: 41.658438 -78.196122

Potter McKean Resources Inc;s., well inventory is available online at the following two links:

Google Drive:

https://docs.google.com/spreadsheets/d/1b6IIeSSyGpbGICL4ZRXTf63S3NjSInKspKald_fms/edit?usp=sharing

This info is also available by searching the DEP's database here:

<https://greenport.pa.gov/ReportExtracts/OG/OilGasWellInventoryReport>

Eight injection wells, along with 70 others were transferred from **Potter McKean Resources Inc.**, to **Potter-McKean Resources of Pennsylvania** (OGO-62770) in 2003.

According to the Pennsylvania Department of State, the officers and owners of **Potter McKean Resources of Pennsylvania** are **James W. Reynolds** and **Robert D. Benson Sr.**

Order Business Documents

Date: 02/17/2021

Business Name History

Name	Name Type
POTTER-MCKEAN RESOURCES OF PENNSYLVANIA	Current Name

Business Entity Details

Name	POTTER-MCKEAN RESOURCES OF PENNSYLVANIA
Entity Number	2935691
Entity Type	Fictitious Names
Status	Active
Citizenship	Domestic
Entity Creation Date	04/26/2000
Effective Date	04/26/2000
State Of Inc	PA
Address	901 BELLS RUN RD PO BOX 527 SHINGLEHOUSE PA 16748-0 Potter

Officers

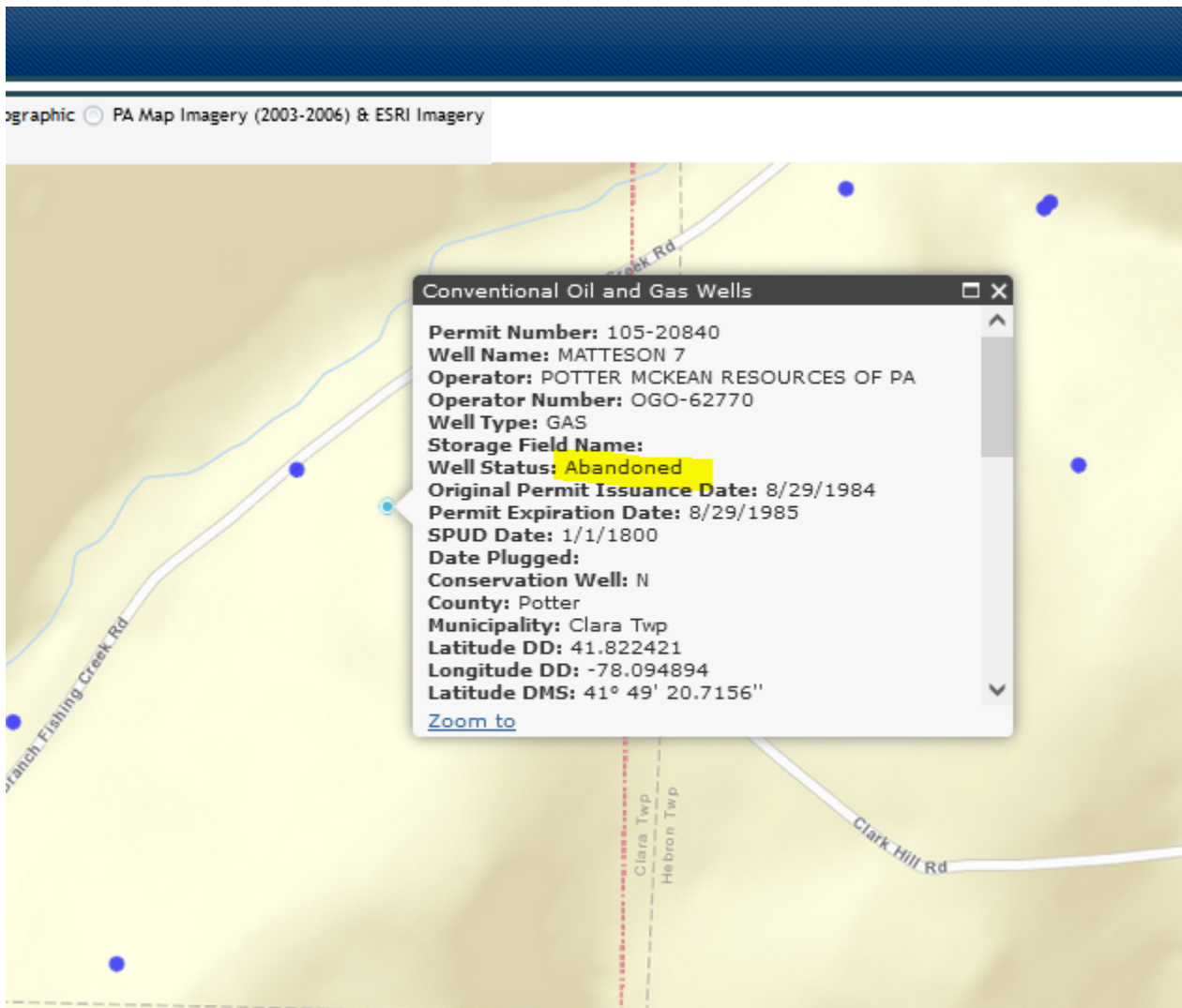
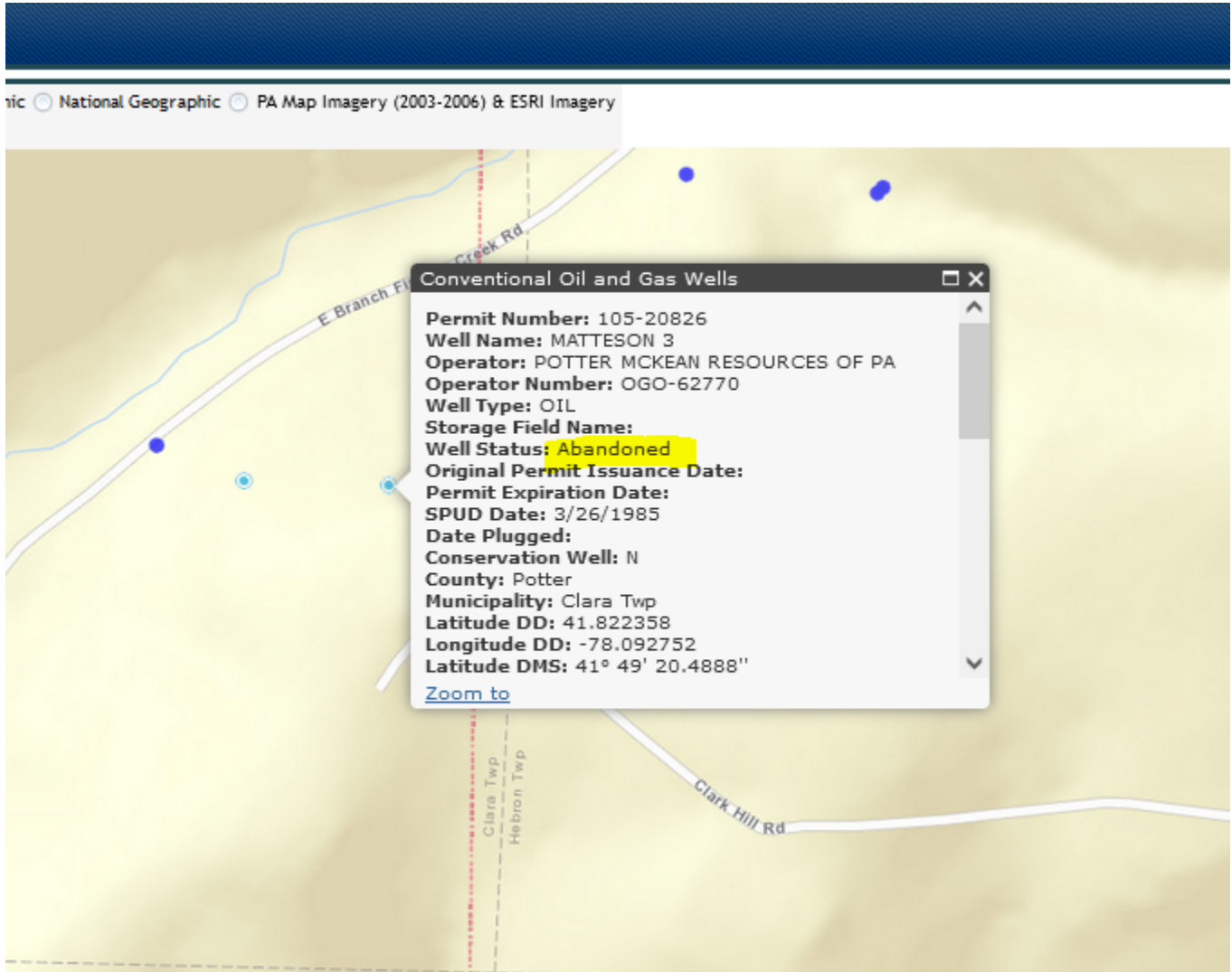
Name	JAMES W REYNOLDS
Title	OWNER
Address	
Name	ROBERT D BENSON SR
Title	OWNER
Address	

James W. Reynolds and **Robert D. Benson Sr.**, owners of **Potter- McKean Resources of Pennsylvania**, currently have [20 wells listed in their inventory](#). Among them are 2 wells that are identified by the DEP's database as "**ABANDONED**".

These include:

- MATTESON 3, **API 105-20826** , status is currently **ABANDONED**
- MATTESON 7, **API 105-20840**, status is currently **ABANDONED**

Pennsylvania's Oil and Gas Act (Act 223) defines an "Abandoned well" as *any well that has not been used to produce, extract or inject any gas, petroleum or other liquid within the preceding 12 months, or any well for which the equipment necessary for production, extraction or injection has been removed, or any well, considered dry, not equipped for production within 60 days after drilling, re-drilling or deepening, except that it shall not include any well granted inactive status.*



These can be viewed on DEP's map here:

<https://gis.dep.pa.gov/PaOilAndGasMapping/OilGasWellsStrayGasMap.html?>

The Matteson 3 Well located in Clara Twp., Potter County, PA was originally cited for violating

the Oil and Gas Act by the department on 4/20/1993 inspection ID 684910. The last onsite inspections of the Matteson 3 & 7 wells were conducted in 1993 according to the DEP database.

Inspections

No Client Inspection for Client ID: 207075 - POTTER MCKEAN RESOURCES OF PA
 No Client Inspection for Client ID: 48636 - POTTER MCKEAN RESOURCES INC
 No Site Inspections for Site ID: 173383 - MATTESON 3 WELL

Primary Facility Inspections for Primary Facility ID : 175336 - MATTESON 3 (105-20826)

Program	Inspection ID	Date Inspected	Inspection Type	Inspection Results	Violations	Operator Respons
OG	684910	04/20/1993	Routine/Complete Inspection	Violation(s) Noted	3	No
OG	681641	01/18/1990	Routine/Complete Inspection	Violation(s) Noted	1	No

Well Operator History

Client Name	Client ID	Client OGO	Start Date	End Date
POTTER MCKEAN RESOURCES OF PA	207075	OGO-62770	03/24/2003	
POTTER MCKEAN RESOURCES INC	48636	OGO-48045	06/13/1994	03/24/2003

The Matteson 7 Well located in Clara Twp., Potter County, PA was originally cited for violating Pennsylvania's Oil and Gas Act (Act 223) by the department on 4/22/1993. DEP inspection ID 684902.

Inspections

No Client Inspection for Client ID: 207075 - POTTER MCKEAN RESOURCES OF PA
 No Client Inspection for Client ID: 48636 - POTTER MCKEAN RESOURCES INC
 No Site Inspections for Site ID: 173397 - MATTESON 7 WELL

Primary Facility Inspections for Primary Facility ID : 175350 - MATTESON 7 (105-20840)

Program	Inspection ID	Date Inspected	Inspection Type	Inspection Results	Violations	Operator Respons
OG	684902	04/22/1993	Routine/Complete Inspection	Violation(s) Noted	3	No

Well Operator History

Client Name	Client ID	Client OGO	Start Date	End Date
POTTER MCKEAN RESOURCES OF PA	207075	OGO-62770	03/24/2003	
POTTER MCKEAN RESOURCES INC	48636	OGO-48045	06/13/1994	03/24/2003

For THIRTY YEARS, from 1993 to the present, according to DEP records, the Matteson 7 Well, API 105-20840 and the Matteson 3 Well API 105-20826 have been abandoned. And they were abandoned by the company owned by **James W. Reynolds** and **Robert D. Benson Sr.** in Clara Twp., Potter County.

Oil & Gas Well Layer

Tasks: Test, Multiple Well, Undetermined, Waste Dispos, Observation, Storage Well

Well Status

Select at least one status from this list.

Active, DEP Orphan, Abandoned, DEP Plugged, DEP Abando, Regulatory Inactive

Well Selection is Now Displayed on

Search for Oil and Gas Wells

Environmental Good Samaritan Projects

Project Status

Select at least one project status from thi

Issued, Denied, Pending, Withdrawn

Conventional Oil and Gas Wells

Permit Number: 105-20826
 Well Name: MATTESON 3
 Operator: POTTER MCKEAN RESOURCES OF PA
 Operator Number: OGO-62770
 Well Type: OIL
 Storage Field Name:
 Well Status: Abandoned
 Original Permit Issuance Date:
 Permit Expiration Date:
 SPUD Date: 3/26/1985
 Date Plugged:
 Conservation Well: N
 County: Potter
 Municipality: Clara Twp
 Latitude DD: 41.822358
 Longitude DD: -78.092752
 Latitude DMS: 41° 49' 20.4888"
[Zoom to](#)

Oil & Gas Well Layer

Tasks: Test, Multiple Well, Undetermined, Waste Dispos, Observation, Storage Well

Well Status

Select at least one status from this list.

Active, DEP Orphan, Abandoned, DEP Plugged, DEP Abando, Regulatory Inactive

Well Selection is Now Displayed on

Search for Oil and Gas Wells

Environmental Good Samaritan Projects

Project Status

Select at least one project status from thi

Issued, Denied, Pending, Withdrawn

Conventional Oil and Gas Wells

Permit Number: 105-20840
 Well Name: MATTESON 7
 Operator: POTTER MCKEAN RESOURCES OF PA
 Operator Number: OGO-62770
 Well Type: GAS
 Storage Field Name:
 Well Status: Abandoned
 Original Permit Issuance Date: 8/29/1984
 Permit Expiration Date: 8/29/1985
 SPUD Date: 1/1/1800
 Date Plugged:
 Conservation Well: N
 County: Potter
 Municipality: Clara Twp
 Latitude DD: 41.822421
 Longitude DD: -78.094894
 Latitude DMS: 41° 49' 20.7156"
[Zoom to](#)

Inspection reports and records on file with the Pennsylvania DEP document these operators have operated wells out of compliance with Pennsylvania's O&G Act since the Oil and Gas Act was first enacted.

James Reynold's long history of well abandonment in Clara Township is reason enough for the DEP to deny the pending injection well permit And I based on the long history of well abandonment I am asking the department to deny the injection well permit.

These owners/ operators have demonstrated an **unwillingness** to comply with the Oil and Gas Act.

I'm requesting the department staff who are currently reviewing this pending injection well application review the records on file with your department; including compliance reports/ inspection records, production and waste reports for the following operators:

- Benson & Reynolds Gas Co (officers: James W. Reynolds and Robert Benson) · Potter-McKean Resources Inc. (officers: James W. Reynolds, Robert Benson & Peter Metritkas.)
- Potter- McKean Resources of PA (officers: James W. Reynolds and Robert D. Benson Sr) · Potter –McKean Resources of Pennsylvania (officers: James W. Reynolds and Robert D. Benson Sr)

It's important to note the 8 wells that were permitted by EPA as injection wells in 1984 on the Matteson Farm have been transferred from one operating corporation to another 5 times since the original UIC permit was authorized.

With Grants received through the recent Infrastructure Investment and Jobs Act (IIJA), Pennsylvania is currently plugging wells that were abandoned by operators with histories far less disreputable than the operator applying for the Clara Township injection well permit. This injection well permit should be denied because of the heightened risk of well abandonment associated with this applicant.

The following are some of my concerns regarding information provided by Roulette Oil and Gas Co LLC on the injection well application.

The [Well Record and Completion Report](#) submitted with the injection well permit has identified the original operator of Clara Field #20, API Number 37-105-21374 as **North Coast Energy**, however DEP's database has recorded EOG Resources Inc., was the original operator of Clara Field # 20.

The screenshot displays the DEP's online database interface. On the left, there are filters for 'Oil & Gas Well Layer' (Active, Plugged, Abandoned, Regulatory Inactive) and 'Environmental Good Samaritan Projects' (Issued, Pending, Cancelled, Denied, Withdrawn, Revoked). The main window shows inspection details for Client ID: 149263 - EOG RESOURCES IINC and Site ID: 691543 - CLARA FIELD 20 OG WELL. A table lists 'Primary Facility Inspections for Primary Facility ID : 695214 - CLARA FIELD 20 (105-21374)' with one entry for inspection ID 3581571 on 07/10/2023. Below this is a 'Well Operator History' table listing various operators and their dates of operation.

Program	Inspection ID	Date Inspected	Inspection Type	Inspection Results	Violations	Operator Respons
OG	3581571	07/10/2023	Routine/Complete Inspection	No Violations Noted	0	No

Client Name	Client ID	Client OGO	Start Date	End Date
ROULETTE OIL & GAS LLC	307592	OGO-68607	01/14/2014	
EXCO RESOURCES PA LLC	285505	OGO-39315	05/30/2012	01/14/2014
EXCO RESOURCES PA INC	48277	OGO-45345	03/05/2008	05/30/2012
EOG RESOURCES INC	149263	OGO-37268	06/28/2007	03/05/2008

There is no operator listed or identified by DEP's online database as North Coast Energy, North Coast Energy Inc., North Coast Energy Co or North Coast Energy LLC etc.

Oil and Gas Well Inventory

Report Summary

The statewide well inventory data can be accessed by utilizing this report. The user can select specific parameters values, and click the Export Report button. The data for the entire state for those values selected will be displayed. Results will be in CSV (Comma Separated Values) format.

[Click here](#) for Data Dictionaries that describe the data elements in report by field name and purpose. Reporting requirements. Additional reports or information related to the Oil and Gas Program can be found [here](#).

Report Instructions

All parameters are required to run the report. Parameters can be used to limit the data that will be retrieved.

Select Parameters

Operator

All

Well Configuration

All

North

- NORTH ALLEGHENY SCH DIST (OGO-11785) (24946)
- NORTH AMER OIL & GAS CO (OGO-11803) (85656)
- NORTH AMER OIL & GAS DRILLING CO INC (OGO-11791) (26681)
- NORTH CAMBRIA FUEL CO (OGO-11797) (32683)
- NORTH CLARION CNTY SCH DIST (OGO-11815) (85657)
- NORTH CTL OIL CORP (OGO-32384) (79556)
- NORTH EAST GAS & OIL CO (OGO-11959) (49225)
- NORTH EAST HEAT & LIGHT CO (OGO-11845) (65905)

Export Report

AND the Pennsylvania Department of State has **no** records of a corporation or business entity named *North Coast Energy*.

<https://www.dos.pa.gov/BusinessCharities/Business/Resources/Pages/Record-Searches.aspx>

I find it concerning that the company identified by the Well Record and Completion Report doesn't even seem to exist in DEP and Department of State databases. Does the DEP require any documentation showing a company actually exists before authorizing permits to drill oil and gas wells?

Is any of the information in North Coast Energy, Inc's permit application accurate?

I also have comments regarding the cement the [Well Record and Completion Report](#). This record indicates the cement did not return to the surface.

WELL RECORD AND COMPLETION REPORT

Well Operator NORTH COAST ENERGY, INC.		DEP ID# 48277	Well API # (Permit / Reg) 105-21374		Project Number	Acres 3300+-		
Address ONE GOJO PLAZA, SUITE 325			Well Farm Name CLARA FIELD		Well # 20	Serial #		
City AKRON	State OH	Zip Code 44311	County POTTER		Municipality CLARA			
Phone (330) 572 - 8500	Fax (330) 252 - 0199	USGS 7.5 min. quadrangle map SHINGLEHOUSE						
Check all that apply: <input checked="" type="checkbox"/> Original Well Record <input checked="" type="checkbox"/> Original Completion Report <input type="checkbox"/> Amended Well Record <input type="checkbox"/> Amended Completion Report								
WELL RECORD Also complete Log of Formations on back (page 2)								
Well Type		<input checked="" type="checkbox"/> Gas <input type="checkbox"/> Oil <input type="checkbox"/> Combination Oil & Gas <input type="checkbox"/> Injection <input type="checkbox"/> Storage <input type="checkbox"/> Disposal						
Drilling Method		<input checked="" type="checkbox"/> Rotary - Air <input type="checkbox"/> Rotary - Mud <input type="checkbox"/> Cable Tool						
Date Drilling Started 5/27/2008		Date Drilling Completed 5/30/2008		Surface Elevation 2305 ft.	Total Depth - Driller 2310 ft.	Total Depth - Logger 2319 ft.		
Casing and Tubing			Cement returned on surface casing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
			Cement returned on coal protective casing? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A					
Hole Size	Pipe Size	Wt.	Thread / Weld	Amount in Well (ft)	Material Behind Pipe Type and Amount		Packer / Hardware / Centralizers Type Size Depth	Date Run
12 1/4	9 5/8	26	T	23	SANDED IN			5/27/2008
8 7/8	7	17	T	501	110 SX 50/50 POZ		SHOE 7 501	5/28/2008
							CENT 7 470,376	5/28/2008

It's my understanding that cementing provides protection by stabilizing the well and ensures that groundwater zones are isolated and protected by isolating oil, gas and water bearing zones. And this is among the public's primary concerns.

According to DEP's Introduction: Coal and Surface Casing FAQs (link:[https://files.dep.state.pa.us/oilgas/bogm/bogmportalfiles/oilgasreports/Construction_Standards_FAQ/FAQ%27s/FAQ_78.83_\(12\).pdf](https://files.dep.state.pa.us/oilgas/bogm/bogmportalfiles/oilgasreports/Construction_Standards_FAQ/FAQ%27s/FAQ_78.83_(12).pdf)) "If no cement returns to surface are realized after attempting to permanently cement the casing, one of the options outlined in 25 Pa. Code Section 78.83b. must be followed."

Q: Were any of these options followed? If so, which option by which operator and when?

Also, page 7 of the PADEP Permit Application for Clara #20 (37-105-21374-00-00) Class II-D Well says "cement returns were noted at the surface". (link: https://drive.google.com/file/d/16l1hl-Oyel-vCYmlaSKqN6njE_jPuUy/view?usp=sharing)

Crop of page 7:

PADEP Permit Application for Clara #20 (37-105-21374-00-00) Class II-D Well for Roulette Oil & Gas Co., LLC

Deepest Fresh Water Zone and Top Injection Zone: The deepest USDW zone reported by the driller of the Clara #20 was at 340' with a fresh water flow of 0.5". Surface casing was set and cemented at 501' or 161' deeper than the fresh water zone. **Cement returns were noted at the surface and confirmed by calculation.** There is no available chemical analysis of the water from this USDW zone and it is now behind pipe, though nearby formation waters were chemically analyzed and provided to the EPA as a part of their application process. Section D of this application contains that analysis.

There are three proposed injection zones in this well. They are the sandstone reservoirs within the Cooper 5-0 (CPR5-0) sequence penetrated from 1486' - 1502'; the Sheffield 3-1 (SHF3-1) sequence penetrated from 1594' - 1617'; and the Kane 3-0 (KANE3-0) sequence, penetrated from 1823-1833.' The top of the uppermost injection zone (Cooper 5-0) occurs at 1,486 feet measured depth. Therefore, the thickness of the interval from the USDW to the topmost injection zone is 1,146 feet.

Could the DEP please include an explanation on what looks to be a discrepancy in whether or not cement returned on the surface casing or not in layman's terms for the public?

How this cementing issue was addressed would speak volumes on the operators ability to comply with requirements set forth by PA code. It also is a good example of the DEP's ability to ensure the environment is protected around oil and gas wells with cementing issues recorded in the 2008 Well Record and Completion Report.

Because of the operator's long and well documented history of well abandonment I demand the DEP deny the injection well permit.