



**Environmental GEO-Technologies, LLC**

October 10, 2017

Mr. Stephen M. Jann, Chief  
Underground Injection Control Branch, WU-16J  
**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Cease Injection Notice, Well 2-12, August 29, 2017, EPA ID No.: MIR 000 016 055

Dear Mr. Jann:

On behalf of Environmental Geo-Technologies, LLC ("EGT"), this letter responds to your subject letter. As stipulated in your letter, EGT ceased injection into Well # 2-12, even blind-flanging (isolating) Well # 2-12 so that it cannot be used, actually at the time that the information was initially submitted to EPA (in advance of your written notice).

EGT has taken the opportunity to commence a thorough review of Well # 2-12 including contacting our injection well consultant, Petrotek, for them to do an additional thorough review and provide EGT with well options regarding workovers, etc. EGT is also attempting to ascertain whether injected waste materials could be responsible for the mechanical integrity loss that was reported. EGT's evaluation is currently ongoing.

EGT has also requested quotations for well workover, etc. efforts, and at this time, and still awaits formal quotations (although EGT has received partial emails thus far) from both Petrotek and one other entity.

Of course, in addition to these efforts, EGT has interfaced with these consultants regarding their knowledge regarding the mechanical integrity loss.

EGT will, of course, keep well # 2-12 shut-in until the activities in paragraphs 2 & 3 above are completed, and, whatever repairs, workover are completed, and then, will schedule another MIT with notice to EPA, obtain the report, submit it to EPA, and not resume operation until mechanical integrity is demonstrated and the Director gives written approval to recommence injection at well # 2-12 (per H.5 of MI-163-1W-C011).

We trust that this is sufficient information for EPA at this time, however, if EPA has any questions, please feel free to contact us. Again, thank you for your consideration.

Sincerely,

Richard J. Powals, P.E.  
Vice President

cc. Larry Organek (MDEQ)  
J. Frost & P. Sullivan (both EGT)

rjp17/EGTEPA090117letterresponse



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

AUG 29 2017

REPLY TO THE ATTENTION OF:  
 WU-16J

CERTIFIED MAIL 7016 1370 0001 5720 3913  
RETURN RECEIPT REQUESTED

Mr. Dimitrios Papas  
 Environmental Geo-Technologies, LLC  
 28470 Citrin Drive  
 Romulus, Michigan 48174

CEASE INJECTION NOTICE

Dear Mr. Papas:

This letter is to confirm the loss of mechanical integrity (MI) that your company reported for the well referenced below. The U.S. Environmental Protection Agency (EPA) hereby notifies you to cease injection activity for this well.

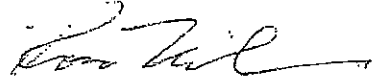
Company Report	Well Name	EPA Permit Number	State Permit Number	MI Requirement
Letter of 07/31/2017	Well 2-12	MI-163-1W-C011	M453	Part I(H) of Permit

You have 45 days from the date of this letter to satisfy the MI requirements referenced above. Please contact Mr. Jeffrey McDonald at (312) 353-6288 or [mcdonald.jeffrey@epa.gov](mailto:mcdonald.jeffrey@epa.gov) to schedule any planned test at least 30 days in advance of the test. EPA may allow a shorter notification period if sufficient to allow the agency an opportunity to witness the test. Upon completion of the MI demonstration, you must submit the test results, rework records, and any other documentation required by permit or rule, as applicable, to EPA for approval. Please also submit any other documents which support the test results, such as gauge calibration certification, third-party service ticket, and/or original chart recordings. The well must remain shut-in until your company receives written authorization from EPA to resume injection.

Please be aware that violations of the Safe Drinking Water Act and underground injection control regulations are subject to administrative penalties of up to \$273,945, civil judicial penalties of up to \$54,789 per day of violation and, in accordance with Title 18 of the United States Code, criminal judicial penalties of up to three years imprisonment and fines. Please also be aware that such violations include operation of the well for injection during the shut-in period.

EPA appreciates your prompt attention to this matter. If you have questions, please contact Valoria Robinson by phone at (312) 886-4281 or by email at [robinson.valoria@epa.gov](mailto:robinson.valoria@epa.gov).

Sincerely,

  
for Stephen M. Jann, Chief  
Underground Injection Control Branch

cc: Larry Organek, MDEQ