

September 1, 2015

United States Environmental Protection Agency

Region 5, WU-16J

77 West Jackson Blvd.

Chicago, Illinois 60604-3590

ATTN: UIC Branch, DI Section

Re: Written Report, EGT Injection Parameter Exceedance, Well 2 Minimum Differential Pressure (in conformance with MI-163-1W-CO11, Part III.A, page 1 of 3)

Ladies & Gentlemen:

Environmental Geo-Technologies, LLC ("EGT") is writing this to inform you that an injection parameter, annulus differential pressure, was exceeded on 08.28.15 during shut down procedures for the coming weekend.

At 2:16:25 pm the annulus pressure was manually bled off of Injection Well 2 system. This was inadvertently done prior to shut off of the injection pump. The differential pressure dropped below the minimum 100 psi for 2.5 minutes and reached the lowest differential pressure of positive (annulus over injection) 14.4 psi. This lowest pressure lasted for less than 10 seconds before annulus pressure started to increase. The alarm system performed as it was designed, and alerted the deep well operator of the condition. As soon as the condition was identified, the deep well operator manually pumped the annulus pressure back up to normal operating pressure range.

At 4:27 pm, EGT (John Frost) called your office and left a message on your voice mail informing you that the minimum differential pressure was exceeded and that a letter would follow within the permit required 5 day period.

The annulus pressure is routinely decreased to a lower pressure range during non-operational periods. The minimum differential exceedance was a result of operator error and was not a condition of the mechanical or electrical systems that provide integrity for the well.

This written report hereby is timely [within five (5) working days] and in conformance with EGT's UIC Injection Permit # MI-163-1W-CO11, Part 1.E.12.d.3 for the occurrence that occurred on 08.28.15 that was verbally reported to Mr. Allan Batka on 08.28.15.

I certify under 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 or persons 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.

We trust that you find this report satisfactory, however, if you have any questions or comments, please feel free to contact us.

Sincerely,

Richard J. Powals, P.E.
Vice President

cc: J. Frost (EGT), P. Sullivan (EGT), T. Athans (HH)

rijp090115/EGTEPAWell#2WrittenReport090115