



Environmental GEO-Technologies, LLC

June 3, 2014

**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

Ladies & Gentlemen:

Environmental Geo-Technologies, LLC ("EGT") hereby timely [within five (5) working days] submits a Written Report (attached) in conformance with its UIC Injection Permit # MI-163-1W-C010, Part 1.E.12.d.3 for an occurrence on May 29, 2014 that was timely [within twenty-four hours] verbally reported to Mr. Allan Batka on May 30, 2014.

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,

A handwritten signature in black ink, appearing to read "Richard J. Powals".

Richard J. Powals, P.E.
Chief Operating Officer

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

att.

060314/rjpEGTEPAWell#1WrittenReport060314

MEMORANDUM

Date: 5/29/14

To: File

From: John Frost

RE: Differential Pressure and Injection Pressure Wellhead #1

Today at 3:37 p.m. Franklin Well Service (FWS), subcontractor to Subsurface Technology Inc. (Subsurface), was conducting a clean out on Well #1 utilizing their own pumping system when the tubing differential pressure minimum limit of 100 psi was exceeded. An EGT deepwell operator was present to witness and oversee the work being conducted. Upon the exceedance of differential pressure, the system alarm sounded and EGT's deepwell operator instructed FWS to cease injection. Differential pressure was restored within three minutes.

Shortly thereafter injection resumed. Then at 3:58 p.m., the maximum injection pressure of 765 was temporarily exceeded. Again EGT's system alarm sounded and the deepwell operator instructed FWS to cease injection. Injection pressure was restored within one minute. Shortly thereafter injection resumed with no further incidents occurring.

It should be noted that EGT's system auto-shutoff was not deployable during these events because FWS was utilizing its own pumping system. Injection was conducted using FWS's tanker truck as a test to check "well flow" after well cleaning had taken place. Once EGT's system alarms were triggered, EGT's deepwell operator immediately instructed FWS to cease injection.

It should also be noted that the exceedance of differential pressure and injection pressure identified on EGT's gauges differed from FWS's gauges. FWS showed no exceedance of pressures on their gauges or operational logs.

Again, during both of these events, an EGT deep well operator was present to witness the triggering of the alarm system and to stop the injection operation. FWS calibration records and operational logs are available to show their operations were within compliance conditions of EGT's Underground Injection Control Permit No. MI-163-1W-C010.