



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

NOV 28 2012

REPLY TO THE ATTENTION OF

Mr. Jeffrey L. Woolstrum
Honigman Miller Schwartz and Cohn LLP
2290 First National Bank Building
660 Woodward Ave,
Detroit MI 48226-3506

Re: Environmental Geo-Technologies, LLC (EGT)
Permit Nos. MI-163-1W-C010 and MI-163-1W-C011

Dear Mr. Woolstrum:

Thank you for your letter dated October 31, 2012, following up on the October 12, 2012 meeting between representatives of EPA and EGT.

EPA has reviewed the information submitted by EGT, and has analyzed the permit provisions, relevant regulations and regulatory background. Based on that review, EPA has concluded that EGT may satisfy Condition I.H.(2)(d) of the permits that "an approved casing inspection log shall be run before injection commences...." by relying on the casing inspection log which was run before injection at the well originally commenced. EPA believes this is a fair reading of the permit language, and is consistent with general regulatory guidance and practice that presumes a casing inspection log should be run when the well tubing is to be pulled for other purposes and does not generally require that well tubing be pulled solely for purposes of conducting a casing inspection.

Throughout the permitting process, EPA has emphasized the importance of assuring that the EGT wells will operate properly after being out of service for several years. The amplified annulus pressure testing that EGT will conduct prior to injection will provide a direct indication of whether the wells have suffered any adverse effects from the period of inactivity and will confirm whether the wells can be successfully returned to full operation. In light of the permit interpretation described above, the amplified annulus pressure testing need not be proposed as an alternative to performing a new casing inspection log. It will instead be considered the Part 1 mechanical integrity demonstration described in Condition I.H.2.a that is required prior to commencing injection pursuant to Condition I.L.3. EPA recognizes that EGT may utilize the standard annulus pressure testing methods for its future periodic mechanical integrity tests under the permits.

Finally, EPA has completed its technical review of the test procedures for the amplified annular pressure test, temperature log, and radioactive tracer survey. I have attached EPA's approval letter with conditions for these test procedures.

Please feel free to contact me at (312) 886-0562 or Krueger.Thomas@epa.gov if you have any questions concerning these matters.

Sincerely,



Thomas J. Krueger
Associate Regional Counsel

cc: Allan Batka, U.S. EPA