Mr. Allan Batka

U.S. Environmental Protection Agency, EPA Region 5

Underground Injection Control

77 W. Jackson Blvd.

Chicago, IL 60604

Allan,

I am writing this notification as described in Part I section E.12(d)(3) of Republic Industrial and Energy Solutions, LLC UIC permit #MI-163-1W-C011 for Well #2-12. This is a follow up to the voice mail message that I left for you on Monday the 25th of January at 4:31 pm central standard time alerting you to an exceedance of our differential pressure on Injection Well II. The exceedance happened as a result of the startup and initial use of Injection Well #2-12.

Our operators started using Injection Well #2-12 at 6:05 am central standard time on the 25th of January. When starting up the injection pumps there was an existing 576 psi on the annulus system, and 112 psi on the injection string. The injection tubing pressure increased until it reached 639 psi and at this point the minimum differential pressure first dropped below 100 psi. This took place at 6:34 am and the exceedance lasted for 29 minutes. This took place because the alarm system and automatic shut off were not properly set up by our current programming company.

Our operators identified the exceedance at 7:02 am central standard time when the differential pressure was at 44 psi and immediately turned on the annulus pump to restore compliance and contacted me to report the situation. After I informed our Director of Operations and Deep Well Engineer of the issue, I instructed the operators to shut down injection operations and to perform an Annulus Pressure Test (APT). At 10:21 am eastern standard time an APT was performed to confirm integrity of the annulus system of Injection Well II. The annulus was pressurized to 1000 psi and locked in from 10:29 am to 11:29 am eastern standard time. The loss of pressure over that hour was 4 psi and well within the allowable 3% loss acceptable to prove mechanical integrity.

The programming company was contacted to make sure that the alarm system and shut off were reprogrammed to operate correctly. Today 1.29.21 we had the programming company follow through and test all alarm conditions required in Part II section B (4) of our UIC permits for both wells. All alarm conditions are currently functional. The differential pressure exceedance was a result of startup and new programming, but positive differential pressure was always maintained on the system, and the internal APT test provided great results.

Please let me know if you require additional information.

Sincerely,

John Frost

Division Manager E&P

Republic Industrial and Energy Services, LLC

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