



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

Tom Morris
President
Pennhills Resources, LLC
3055 Route 219
Kane, PA 16735

Re: Notice of Deficiency; Pennhills Permit Application; PAS2R410BMCK
Underground Injection Control (UIC) Program; Class IIR Proposed Injection Well Nos. T-10,
1002, 39

Dear Mr. Morris:

On March 30, 2020, the U.S. Environmental Protection Agency (EPA) received your application for a new area permit for three enhanced recovery injection wells (Class IIR) in the Kane Field, McKean County, Pennsylvania. Your permit application has been assigned the permit identification number PAS2R410BMCK. All future correspondence regarding this permit application should use this identification number.

The technical review for this application began on April 20, 2020 and overall, the application is comprehensive and the required attachments and accompanying information have been submitted to EPA. However, EPA would like for Pennhills to submit some additional information to address certain deficiencies before we can continue processing the application. The deficiencies are as follows:

1. Completion reports for the proposed injection wells (Well Nos. T-10, 1002, and 39) were not included in the application submittal. EPA requests these reports to understand how the wells were originally constructed and to verify their total depths.
2. EPA obtained the completion report for Well No. 1002 (API: 37-083-56741) from the Pennsylvania Department of Environmental Protection which lists the Haskell formation at a depth of 2,590 feet to 2,633 below ground surface. The information that Pennhills submitted in Attachment B – Part I. Geological Data lists the Haskell formation at 2,560 to 2,640 feet below ground surface. Please explain this discrepancy.



Please send the requested information to Kevin Rowsey at rowsey.kevin@epa.gov. Once EPA has received the necessary information, we can proceed with processing the draft permit and statement of basis. Thank you for your cooperation on this matter. If you have any questions or concerns, please contact Kevin at 215-814-5463.

Sincerely,

James C. Bennett, Jr., Chief
Source Water & UIC Section
Drinking Water & Source Water Protection Branch