



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region8](http://www.epa.gov/region8)

Ref: 8WD-SDU

**SENT VIA EMAIL  
DIGITAL READ RECEIPT REQUESTED**

Scott Kerr  
Wesco Operating, Inc  
[scottk@kirkwoodcompanies.com](mailto:scottk@kirkwoodcompanies.com)

Re: Underground Injection Control (UIC) Permit WY20654-03747, Construction Change,  
SA Tribal 44 Well, Draft Major Permit Modification, Fremont County, Wyoming

Dear Mr. Kerr:

The U.S. Environmental Protection Agency Region 8 has reviewed your June 19, 2020, request for a well construction change for the UIC Permit and well listed above.

Wesco Operating Inc., operator of the SA Tribal #44 (also known as the Lander Phosphoria #44) injection well, requests modification of the permitted injection well construction for the SA Tribal #44, EPA Permit number WY20654-03747, API # 49-013-05881. This well lost mechanical integrity and was reported to EPA on May 22, 2020.

Enclosed is the draft UIC major permit modification to incorporate an addition of a liner casing and reduction in tubing size in the well's construction which are presented in Appendix A of the referenced UIC Permit. These construction changes will also result in changes to Permit conditions in Part II, Section A, paragraphs 1 and 2, of the original permit as well. The casing liner will be installed to isolate a leak in the long string casing. The addition of the liner will result in a reduction in the injection tubing size. Wesco will need to run a Part I (Internal) Mechanical Integrity Test, Cement Bond Log, and Step Rate Test following well completion activities and prior to receiving authorization to recommence injection on the SA Tribal #44 well as identified in Appendix B of the permit. An updated Rework Form 7520-19 must be submitted following the completion of well re-construction activities. Also, the responsible party for the well operations and adherence to the permit conditions is changed from Amoco Production Company to Wesco Operating, Inc.

EPA regulations and procedures for issuing UIC permit decisions are found in Title 40 of the Code of Federal Regulations (40 CFR) part 124. These regulations and procedures require a public notice and the opportunity for the public to comment on this proposed permit decision. The public comment period will run for at least 30 days and a courtesy announcement of the comment period will be published in the following newspaper:

*The Riverton Ranger, Riverton, Wyoming*

A final decision will not be made until after the close of the comment period. All relevant comments will be taken into consideration. If any substantial comments are received, the effective date of the final Permit will be delayed for an additional 30 days, as required by 40 CFR § 124.15(b), to allow for any potential appeal of the final permit decision.

EPA regulations and procedures for modification of UIC Permits are found in Title 40 of the Code of Federal Regulations, Sections 124.5 and 144.39. These regulations and procedures require a 30-day public notice period.

Please remember that it is your responsibility to be aware of, and to comply with, all conditions of the Permit. If you have any questions regarding this Permit modification, please call Linda Bowling at (303) 312-6254 or (800) 227-8917, extension 312-6254.

Sincerely,

 Invalid signature

 Douglas Minter for

Signed by: DOUGLAS MINTER

Sarah Bahrman, Chief  
Safe Drinking Water Branch

Enclosures:

Attachment - Draft UIC Major Permit Modification

cc:

*Eastern Shoshone Indian Tribe:*

Honorable Vernon Hill, Sr, Chairman

Eastern Shoshone Tribe of the Wind River Reservation, Wyoming

[vernehill@gmail.org](mailto:vernehill@gmail.org)

Leslie Shakespeare, Co-Chairman

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Phoebe Wilson, receptionist and Environmental Director Contact

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Joshua Mann, Tribal Historic Preservation Officer

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*Wyoming Historic Preservation Officer:*

Mary Hopkins

[Mary.hopkins@wyo.gov](mailto:Mary.hopkins@wyo.gov)

*Northern Arapaho Indian Tribe:*

Honorable Lee Spoonhunter, Chairman

Northern Arapaho Tribe of the Wind River Reservation, Wyoming

[lee.spoonhunter@northernarapaho.com](mailto:lee.spoonhunter@northernarapaho.com)

Anthony Addison, Sr, Co-Chairman

Contact is [debbie.antelope@northernarapaho.com](mailto:debbie.antelope@northernarapaho.com)

Dean Goggles, Environmental Director

[Dean.goggles@northernarapaho.org](mailto:Dean.goggles@northernarapaho.org)

Ben Ridgely, Tribal Historic Preservation Officer

Contact is [debbie.antelope@northernarapaho.com](mailto:debbie.antelope@northernarapaho.com)

*Wesco Operating, Inc:*

Chad Forsman

[chadf@kirkwoodcompanies.com](mailto:chadf@kirkwoodcompanies.com)

Attachment  
Draft UIC Major Permit Modification

Note: An electronic copy of the revised permit with the ownership change and construction changes included is attached to the email correspondence.