

American Shale Oil, LLC (AMSO)
EPA Response to the Public Comments
CO52143-08524

1. The commenter stated that “EPA proposes that AMSO be simply allowed to forego monitoring, so that there will be no way of knowing if the temperature requirements are met or not.”

EPA Response:

The permit modification does not propose to eliminate monitoring requirements. The final permit requires two fiber optic probes which measure the temperature from surface to the top of the injection zone. One cable resides in the 7” tubing to monitor daily operational activities and will alarm when subsurface temperature exceeds 750 deg F (399 deg C). The second fiber optic cable has been placed exterior of the 9 5/8” casing and is housed in a metal protective conduit (tube) embedded in cement and continuously measures discrete temperature readings at intervals of at least every 10 feet. The permit modification does not alter the monitoring requirement. However, this modification does alter the maximum temperature requirements allowed before an alarm sounds and AMSO is required to shut down their operation.

The Final Permit Modification and accompanying Statement of Basis has been modified to provide additional clarity that the temperature monitoring has not been removed.

2. The commenter stated “AMSO should be required to show that it can insulate its well properly and it certainly should be required to monitor temperatures”

EPA Response:

EPA has determined that the well, as constructed, does not pose a risk to USDWs and will not be required to perform remedial action. Deviation from the approved construction plan is permissible as long as the revised plans do not pose a risk to USDWs. The second part of this comment is addressed in the EPA response above.