



ENGINEERING & PRODUCTION CORP.

Petroleum Engineering Consulting
Lease Management
Contract Pumping

7415 East Main
Farmington, New Mexico 87402
(505) 327-4892

May 15, 1995

Mr. Frank Chavez
N.M. Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

REF: 21st Century Investment Company
Underground Injection Control Permit
Permit #NN294000007
Mesa Gallup Lease

Dear Mr. Chavez:

As per our conversation of May 11, 1995, concerning changing producing wells to injection wells, enclosed you will find a copy of the final Underground Injection Control Program Permit from the EPA. As I understand it, this will take the place of form C-108 and all attachments.


If anything else is needed please let me know.

Sincerely,


Ruth E Rogge

cc: OCD, Santa Fe, N.M.
Enclosure Attached

Enclosure

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UNDERGROUND INJECTION CONTROL PROGRAM

PERMIT

Class II Water Injection Well

Area Permit No. NN294000007

Field Name: Mesa Gallup Field

San Juan County, New Mexico

Navajo Nation

Issued to:

21st Century Investments
c/o Walsh Engineering and Production Corporation
204 N. Auburn
Farmington, New Mexico 87401

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PART I. AUTHORIZATION TO INJECT

Pursuant to the Underground Injection Control Regulations of the U. S. Environmental Protection Agency codified at Title 40 of the Code of Federal Regulations, Parts 124, 144, 145, 146, 147 and 148,

21st Century Investments
c/o Walsh Engineering and Production Corporation
204 N. Auburn
Farmington, New Mexico 87401

is hereby authorized to convert three existing oil producing wells to Class IIR injection wells, commonly known as the Navajo Nos. 7, C-1, and C-3 wells. These wells are located in Sections 24, 15, 14 respectively, T32N, R18W in San Juan County, New Mexico.

Injection shall be for the purpose of enhanced oil recovery in accordance with the conditions set forth herein.

All conditions set forth herein refer to Title 40 Parts 124, 144, 146, 147 and 148 of the Code of Federal Regulations and are regulations that are in effect on the date that this permit becomes effective.

This permit consists of a total of 20 pages and includes all items listed in the Table of Contents. Further, it is based upon representations made by the permittee and on other information contained in the administrative record. It is the responsibility of the permittee to read and understand all provisions of this permit.

This permit and the authorization to inject are issued for a period up to the operating life of the facility unless terminated under the conditions set forth in Part III, Section B of this permit. The permit will expire upon delegation of primary enforcement responsibility for the UIC Class II Program to an appropriate agency of the Navajo Nation, unless the Navajo Nation agency has the appropriate authority and chooses to adopt and enforce this permit as a State permit.

Issued this 9th day of November, 1994

This permit shall become effective October 4, 1994


Harry Seraydarian, Director*
Water Management Division

*"Director", as used herein, refers to the Director, Water Management Division, U.S. EPA Region 9, San Francisco, CA.

PART II. SPECIFIC PERMIT CONDITIONS

A. WELL CONSTRUCTION

1. Casing and Cementing. The existing construction history and well schematic details submitted with the application are hereby incorporated into this permit as Appendix A, and shall be binding on the permittee. The 7" surface casing has been cemented to surface to prevent the movement of fluids behind the casing. There are no underground sources of drinking water (USDWs) above the injection intervals in the area of review. The casing and cement used in the construction of the wells have been designed for the life expectancy of the wells, and shall be maintained throughout the operating life of each well. The casing and cementing detail in each well follows:

<u>WELL</u>	<u>SURFACE CASING depth, ft.</u>	<u>LONG STRING depth, ft.</u>	<u>TOP OF CEMENT depth, ft.</u>	<u>PERFORATION ZONE depth, ft.</u>
9 No. 7.....	30.....	1482.....	1022.....	1427 to 1438
No. C-1.....	30.....	1276.....	701.....	1223 to 1238
No. C-3.....	39.....	1373.....	453.....	1312 to 1320

2. Tubing and Packer Specifications. Two and three-eighths (2-3/8) inches diameter injection tubing will be utilized, with the end of the tubing and the packer set inside the 4-1/2 inch casing at the depths indicated on the well schematics. The casing/tubing annulus will be filled with corrosion-inhibited fluid. Injection between the outermost casing and the wellbore is prohibited.
3. Formation Logging and Testing. Prior to beginning injection under the authority of this permit, the permittee shall obtain the existing static reservoir pressure of the injection formation by means of an appropriate pressure test method.
4. Monitoring Devices. The operator shall install and maintain in good operating condition:
 - (a) A tap on the discharge line between the injection pump and the wellhead for the purpose of obtaining representative samples of the injection fluids;
 - (b) Two one-half (1/2) inch FIP fittings, isolated by plug or globe valves, and positioned to provide for either (1) the permanent attachment of one-half (1/2) inch MIP gauges, or (2) the attachments for equivalent "quick-disconnect" gauges at the wellhead on the injection tubing and on the

tubing/casing annulus. The gauges used shall be of a design to provide (1) a full pressure range of 100 percent greater than the anticipated operating pressure, and (2) a certified deviation accuracy of five (5) percent or less; and

- (c) A flow meter with measured cumulative volumes that are certified for a deviation accuracy of five (5) percent or less throughout the range of injection rates allowed by the permit.

- 5. Proposed Changes and Workovers. The permittee shall give advance notice to the Director, as soon as possible, of any planned physical alterations or additions to the permitted injection well. Any changes in the well construction will require prior approval of the EPA and a permit modification under the requirements of 40 CFR 144.39. In addition, the permittee shall provide all records of well workovers, logging, or other subsequent test data, including required mechanical integrity testing, to EPA within sixty (60) days of completion of the activity. Appendix B contains samples of the appropriate reporting forms. Demonstration of mechanical integrity shall be performed within thirty (30) days of completion of workovers or alterations and prior to resuming injection activities, in accordance with Part II, Section C.1.(a) of this permit.

B. CORRECTIVE ACTION

No corrective action will be required on the proposed injection wells Navajo No.s 7, C-1, and C-3. The wells are properly constructed with appropriate tubing, casing, packer and cement configurations.

No corrective action will be required in the wells within the one-half-mile AOR of each proposed injection well. All wells within the AOR are properly constructed or plugged and abandoned in accordance with the provisions of 40 CFR 144.55 and 40 CFR 146.07. Only one of the wells in the AOR penetrates a known USDW in the Morrison formation, the Navajo No. 18 water supply well in the SE SE Section 14-T32N-R18W. The USDW is located below the injection interval (in the Gallup producing formation) and is separated from the injection formation by confining layers several hundred feet in thickness.

C. WELL OPERATION

- 1. Commencement of Injection Operations. Injection operations may commence after the effective date of this permit only if the permittee has demonstrated that the well has mechanical integrity in accordance with 40 CFR 146.8 and has received written notice from the

1. The first part of the document is a list of the names of the persons who have been appointed to the various positions of the Board of Directors of the Corporation. The names are listed in alphabetical order, and each name is followed by the position to which he or she has been appointed. The names are as follows:

Mr. A. B. C.

Mr. D. E. F.

Mr. G. H. I.

Mr. J. K. L.

Mr. M. N. O.

Mr. P. Q. R.

Mr. S. T. U.

Mr. V. W. X.

Mr. Y. Z. A.

Mr. B. C. D.

Mr. E. F. G.

Mr. H. I. J.

Mr. K. L. M.

Mr. N. O. P.

Mr. Q. R. S.

Mr. T. U. V.

Mr. W. X. Y.

Mr. Z. A. B.

Mr. C. D. E.

Mr. F. G. H.

Mr. I. J. K.

Mr. L. M. N.

Mr. O. P. Q.

Mr. R. S. T.

Mr. U. V. W.

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Mr. A. B. C.

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Mr. M. N. O.

Mr. P. Q. R.

Mr. S. T. U.

Mr. V. W. X.

Mr. Y. Z. A.

Director that such demonstration is satisfactory. The permittee shall notify EPA of its intent to demonstrate mechanical integrity at least thirty (30) days prior to such demonstration.

2. Mechanical Integrity.

(a) Method for Demonstrating Mechanical Integrity.

- (i) All injection wells must have and maintain mechanical integrity consistent with 40 CFR 146.8. The permittee must show that there is no significant fluid movement through vertical channels adjacent to the injection well bore.
- (ii) A demonstration of the absence of significant leaks in the casing, tubing and/or packer must be made by performing a tubing/casing annulus pressure test. This test shall be for a minimum of thirty (30) minutes at a pressure equal to the maximum allowable injection pressure. The frequency of testing and monitoring will be according to the schedule in paragraph (b) below. A well passes the mechanical integrity test if there is less than a five (5) percent change in pressure over the thirty (30) minute period.
- (iii) The permittee has fulfilled the requirements listed in 40 CFR 146.8 for demonstrating the absence of fluid movement into a USDW through vertical channels adjacent to the injection wellbore. The permittee has submitted cementing records that demonstrate the presence of adequate cement to prevent such migration.

(b) Schedule for Demonstrations of Mechanical Integrity.

- (i) A demonstration of mechanical integrity shall be made no less frequently than every five (5) years from the effective date of this permit, in accordance with 40 CFR 146.8 and paragraph (a) above. Mechanical integrity shall also be demonstrated any time that a workover is conducted, the construction of the well is modified or when loss of mechanical integrity becomes evident during operation.
- (ii) It shall be the permittee's responsibility to arrange and conduct the mechanical integrity

demonstrations. The permittee shall notify the Director of intent to demonstrate mechanical integrity at least thirty (30) days prior to each such demonstration. Results of the test shall be submitted to the Director as soon as possible but no later than sixty (60) days after the demonstration.

(iii) In addition to any demonstration made under paragraph (i) above, the Director may require a demonstration of mechanical integrity at any time during the life of the well.

(c) Loss of Mechanical Integrity. If (1), the well fails to demonstrate mechanical integrity during a test, or (2), a loss of mechanical integrity becomes evident during operation, or (3), a significant change in the annulus or injection pressure occurs during normal operating conditions, the permittee shall notify the Director in accordance with Part III, Section E.10 of this permit. Furthermore, injection activities shall be terminated immediately and operation shall not be resumed until the permittee has taken necessary actions to restore integrity to the well and EPA gives approval to recommence injection.

3. Injection Interval. Injection shall be permitted for the Gallup formation in the subsurface intervals indicated on the well schematic for each well. Injection perforations may be added or squeezed-off only within these intervals. Alteration of the injection perforations and other rework operations must be properly reported (EPA Form 7520-12) and the well must demonstrate mechanical integrity before injection is resumed.

4. Injection Pressure Limitation.

(a) The injection pressure (measured at the wellhead) shall not exceed the formation fracture pressure as determined by a valid step-rate test. Injection pressures shall not exceed those listed below before a step-rate test is conducted and approved by the EPA.

Navajo No. 7.....1427 feet * (.2) = 285 psig
Navajo No. C-1.....1223 feet * (.2) = 245 psig
Navajo No. C-3.....1312 feet * (.2) = 262 psig

The pressure limitation is based on an estimated fracture pressure calculated from the following relationship: $P_{max} = [.2 \text{ psig/foot}] * [\text{Depth}]$. This relationship is the basis for determining the

maximum injection pressure (Pmax) allowed for existing Class II injection wells on Navajo lands as described at 40 CFR 147.3006. It is adopted in this permit as the basis for setting the maximum injection pressure until step-rate tests are conducted and higher pressures are permitted by EPA.

- (b) The Director will determine the maximum allowable injection pressure based upon the step-rate test results and other parameters reflecting actual injection operations.
- (c) The results of the maximum allowable injection pressure determination as stated in paragraph (b) shall be made a part of this permit by minor modification without further opportunity for public comment.

5. Injection Volume (Rate) Limitation.

- (a) The maximum injection rate for each well shall be limited to 300 bwpd.
- (b) The permittee may request an increase in the maximum rate allowed in paragraph (a). Any such request shall be made in writing to the Director.
- (c) Should any increase in rate be requested, the permittee shall demonstrate to the satisfaction of the Director that the increase in volume will not cause migration of formation or injected fluids into any USDW, nor cause any injected fluids to move beyond the Area of Review boundary.

6. Injection Fluid Limitation.

- (a) The permittee shall not inject any hazardous wastes as defined by 40 CFR §261, at any time during the operation of the facility.
- (b) The well shall be used only for the injection of water produced from the Gallup oil reservoir and from the Entrada aquifer in the No. 18 water supply well. Injection of water will be solely for the purpose of enhanced oil recovery. The total dissolved solids (TDS) of the injected fluid shall not exceed 43,000 ppm.
- (c) Fluids to be injected other than those described in paragraph (b), above, shall be limited to occasional minor amounts of well treatment fluids such as dilute acids and corrosion inhibiting

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fluids. The injection of any fluids other than those described in paragraph (b), above, shall be reported to the Director within thirty (30) days.

D. MONITORING, RECORDKEEPING, AND REPORTING OF RESULTS

1. Injection Well Monitoring Program. Samples and measurements shall be representative of the monitored activity. The permittee shall utilize the applicable analytical methods described in Table I of 40 CFR §136.3, or in Appendix III of 40 CFR §261, or in certain circumstances, other methods that have been approved by the EPA Administrator. Monitoring shall consist of:
 - (a) Analysis of the injection fluids. The analysis shall be performed:
 - (i) annually for total dissolved solids, major ions, pH, specific conductivity, specific gravity; and
 - (ii) whenever there is a change in the source of injection fluids.
 - (b) Monthly recordings of injection pressure, annulus pressure, flow rate and cumulative volume.
2. Monitoring Information. Records of any monitoring activity required under this permit shall include:
 - (a) The date, exact place, and time of sampling or field measurements;
 - (b) The name of the individual(s) who performed the sampling or measurements;
 - (c) The exact sampling method(s) used to take samples;
 - (d) The date(s) laboratory analyses were performed;
 - (e) The name of the individual(s) who performed the analyses;
 - (f) The analytical techniques or methods used by laboratory personnel; and
 - (g) The results of such analyses.
3. Recordkeeping.

- (a) The permittee shall retain records concerning:
 - (i) the nature and composition of all injected fluids until three (3) years after the plugging and abandonment has been carried out in accordance with the Plugging and Abandonment Plan shown in Appendix C.
 - (ii) all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit for a period of at least five (5) years from the date of the sample, measurement or report throughout the operating life of the well.
- (b) The permittee shall continue to retain such records after the retention period specified in paragraphs (a) (i) and (a) (ii) unless it delivers the records to the Director or obtains written approval from the Director to discard the records.
- (c) The permittee shall maintain copies (or originals) of all pertinent observation records available for inspection at the facility.

- 4. Reporting of Results. The permittee shall submit an Annual Report to the Director summarizing the results of the monitoring required by Part II, Sections D.1-2. of this permit. Copies of all monthly records on flow rates, volumes, pressures and injected fluids, and any major changes in characteristics or sources of injected fluid shall be included in the Annual Report.

The first Annual Report shall cover the period from the effective date of this permit through December 31. Subsequently, the Annual Report shall cover the period of January 1 through December 31, and shall be submitted by January 31 of the following year. Appendix B contains Form 7520-11 which may be copied and used to submit the annual summary of monitoring.

E. PLUGGING AND ABANDONMENT

- 1. Notice of Plugging and Abandonment. The permittee shall notify the Director forty-five (45) days before further conversion, workover, or abandonment of the well. The Director may require that the plugging and abandonment be witnessed by an EPA representative.
- 2. Plugging and Abandonment Plan. The permittee shall plug and abandon the well as provided in the Plugging

and Abandonment Plan in Appendix C. The EPA reserves the right to change the manner in which the well will be plugged if the well is modified during its permitted life or if the well is not consistent with EPA requirements for construction or mechanical integrity. The Director may ask the permittee to estimate and to update the estimated plugging cost periodically. Such estimates shall be based upon costs which a third party would incur to plug the well according to the plan.

3. Cessation of Injection Activities. After a cessation of operations of two (2) years, the permittee shall plug and abandon the well in accordance with the Plugging and Abandonment Plan, unless he has:
 - (a) provided notice to the Director;
 - (b) demonstrated that the well will be used in the future; and
 - (c) described actions or procedures, satisfactory to the Director, that will be taken to ensure that the well will not endanger underground sources of drinking water during the period of temporary abandonment.
4. Plugging and Abandonment Report. Within sixty (60) days after plugging the well, the permittee shall submit a report on Form 7520-13 to the Director. The report shall be certified as accurate by the person who performed the plugging operation and the report shall consist of either: (1) a statement that the well was plugged in accordance with the plan, or (2) where actual plugging differed from the plan, a statement specifying the different procedures followed.

F. FINANCIAL RESPONSIBILITY

1. Demonstration of Financial Responsibility. The permittee is required to maintain financial responsibility and resources to close, plug, and abandon the injection well as provided in the plugging and abandonment plan.
 - (a) The subject wells are currently covered by letters of credit issued by the Liberty Bank and Trust Company of Tulsa, Oklahoma in the amount of fifteen thousand (\$15,000) each well. The numbers are 8724, 8725, 8726, 8727 and 8728. The beneficiary is the Bureau of Indian Affairs, Navajo Area Office.

- (b) The permittee must provide proof to the EPA of the renewal of the letters of credit every year by October 1.
- 2. Insolvency of Financial Institution. The permittee must submit an instrument of financial responsibility acceptable to the Director within sixty (60) days after either of the following events occur:
 - (a) the institution issuing the bond or financial instrument files for bankruptcy; or
 - (b) the authority of the trustee institution to act as trustee, or the authority of the institution issuing the financial instrument is suspended or revoked.

PART III. GENERAL PERMIT CONDITIONS

A. EFFECT OF PERMIT

The permittee is allowed to engage in underground injection in accordance with the conditions of this permit. The permittee, as authorized by this permit, shall not construct, operate, maintain, convert, plug, abandon, or conduct any other injection activity in a manner that allows the movement of fluid containing any contaminant into underground sources of drinking water, if the presence of that contaminant may cause a violation of any primary drinking water regulation under 40 CFR §142 or otherwise adversely affect the health of persons. Any underground injection activity not authorized in this permit or otherwise authorized by permit or rule is prohibited. Issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local law or regulations. Compliance with the terms of this permit does not constitute a defense to any enforcement action brought under the provisions of Section 1431 of the Safe Drinking Water Act (SDWA) or any other law governing protection of public health or the environment for any imminent and substantial endangerment to human health or the environment, nor does it serve as a shield to the permittee's independent obligation to comply with all UIC regulations.

B. PERMIT ACTIONS

- 1. Modification, Reissuance, or Termination. The Director may, for cause or upon request from the permittee, modify, revoke and reissue, or terminate this permit in accordance with 40 CFR Sections 124.5, 144.12, 144.39, and 144.40. The permit is also subject to minor

1. The first part of the document is a list of names and their corresponding dates of birth. The names are listed in a single column, and the dates are listed in a single column to the right of the names. The names are: John Doe, Jane Doe, and John Doe. The dates are: 1980, 1981, and 1982.

modifications for cause as specified in 40 CFR §144.41. The filing of a request for a permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition.

2. Transfers. This permit is not transferable to any person except after notice is provided to the Director and the permittee complies with the requirements of 40 CFR §144.38. The Director may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the SDWA.

C. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

D. CONFIDENTIALITY

In accordance with 40 CFR Part 2 and 40 CFR §144.5, any information submitted to EPA pursuant to this permit may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of submission, EPA may make the information available to the public without further notice. If a claim is asserted, the validity of the claim will be assessed in accordance with the procedures in 40 CFR Part 2 (Public Information). Claims of confidentiality for the following information will be denied:

- The name and address of the permittee, and
- Information which deals with the existence, absence, or level of contaminants in drinking water.

E. GENERAL DUTIES AND REQUIREMENTS

1. Duty to Comply. The permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit. Any permit noncompliance constitutes a violation of the SDWA and is grounds for enforcement action, permit termination, revocation and reissuance, or modification. Such noncompliance may also be grounds for enforcement action under the

Resource Conservation and Recovery Act (RCRA).

2. Penalties for Violations of Permit Conditions. Any person who violates a permit requirement is subject to civil penalties, fines, and other enforcement action under the SDWA and may be subject to such actions pursuant to RCRA. Any person who willfully violates permit conditions may be subject to criminal prosecution.
3. Need to Halt or Reduce Activity not a Defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
4. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit.
5. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.
6. Duty to Provide Information. The permittee shall furnish the Director, within a time specified, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.
7. Inspection and Entry. The permittee shall allow the Director, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:
 - (a) enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records are kept under the conditions on this permit;

- (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the SDWA any substances or parameters at any location.
- 8. Records of the Permit Application. The permittee shall maintain records of all data required to complete the permit application and any supplemental information submitted for a period of five (5) years from the effective date of this permit. This period may be extended by request of the Director at any time.
- 9. Signatory Requirements. All reports or other information requested by the Director shall be signed and certified by a responsible corporate officer or duly authorized representative according to 40 CFR §144.32.
- 10. Reporting of Noncompliance.
 - (a) Anticipated Noncompliance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
 - (b) Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than thirty (30) days following each schedule date.
 - (c) Twenty-four Hour Reporting.
 - (i) The permittee shall report to the Director any noncompliance which may endanger health or the environment. Information shall be provided orally within twenty-four (24) hours from the time the permittee becomes aware of the circumstances by telephoning the EPA project officer. The following information shall be included in the verbal report:

- (A) Any monitoring or other information which indicates that any contaminant may cause endangerment to an underground source of drinking water.
 - (B) Any noncompliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between underground sources of drinking water.
- (ii) A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
- (d) Other Noncompliance. The permittee shall report all other instances of noncompliance not otherwise reported at the time monitoring reports are submitted. The reports shall contain the information listed in Part III, Section E.10.(c)(ii) of this permit.
- (e) Other Information. Where the permittee becomes aware that it failed to submit all relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the permittee shall submit such facts or information within two (2) weeks of the time such information becomes known.

1. The first line of the document is a header line.

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APPENDIX A

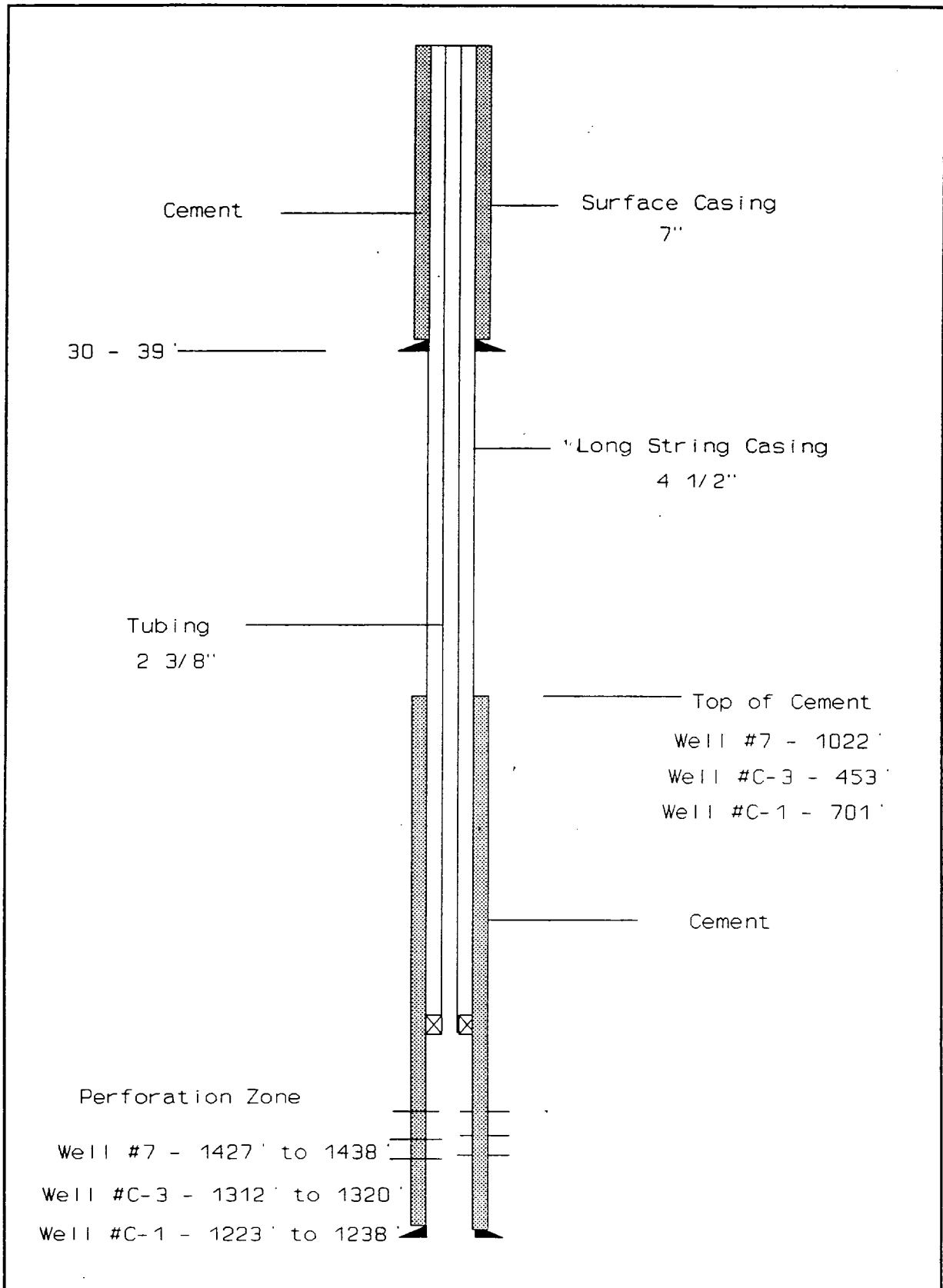


Figure 1 Well Schematic

APPENDIX B - REPORTING FORMS

1. EPA Form 7520-7: Application to Transfer Permit
2. EPA Form 7520-8: Injection Well Monitoring Report
3. EPA Form 7520-12: Well Rework Record
4. EPA Form 7520-13: Plugging Record

