

## Roulette Oil & Gas Company, LLC's Application for the Clara Field #20 Injection-Disposal Well Clara Township, Potter County

### BACKGROUND

- The Clara Field #20 Class II-D Underground Injection Control permit was issued by the U.S. EPA on December 10, 2021, with an effective date of January 14, 2022.
- On August 30, 2022, StratResources Geologic Consulting, LLC, on behalf of the well operator, Roulette Oil & Gas Company, LLC (Roulette), submitted an application to the Pennsylvania Department of Environmental Protection (PA DEP; DEP) to change the use of the Clara Field #20 gas well from a production well to an Injection-Disposal well, solely for injection of waste produced through Roulette's conventional oil and gas operations.

### REVIEW PROCESS

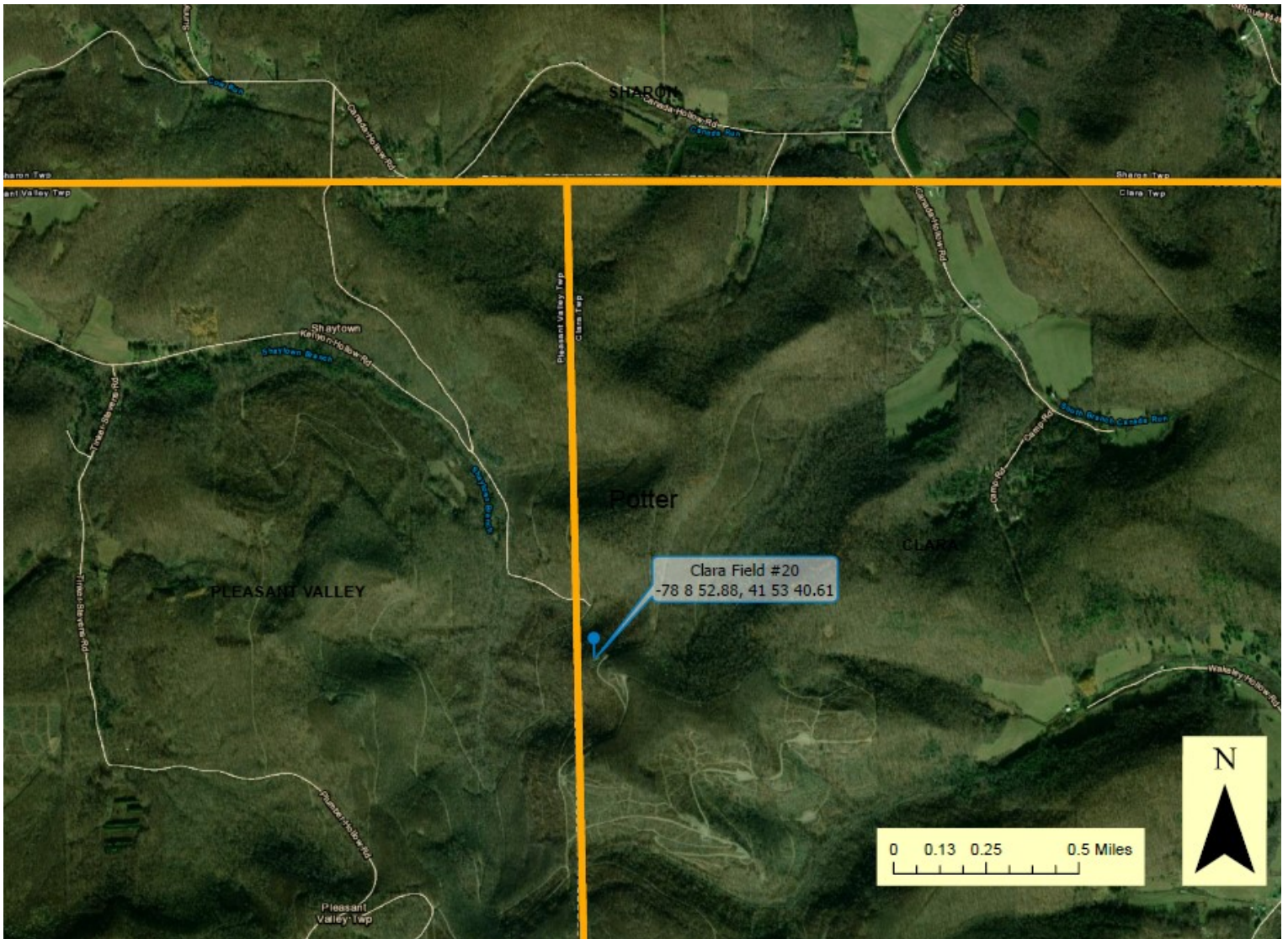
- The Roulette permit application to PA DEP was accompanied by an Erosion and Sedimentation Plan (E&S Plan), a Control and Disposal Plan (C&D Plan), a Casing and Cementing Plan (C&C Plan), the permit application to the U.S. Environmental Protection Administration (EPA), and the permit issued by EPA. The EPA granted Roulette a permit to inject waste water into the well, effective January 14, 2022, and pending DEP approval of the well permit application.
- EPA's permit governs the material that is injected into the well, well integrity, groundwater protection, and well-closure requirements. DEP's permit covers the location and construction/reworking of the well bore, surface issues, and an examination of the potential for pollution resulting from underground disposal.
- As part of the DEP review process, the drilling application is examined by a DEP Licensed Professional Geologist, who also conducts a geologic assessment of the well using information included in the EPA application.
- A DEP Water Quality Specialist reviews the E&S plan, which outlines how runoff from the site will be prevented, and the C&D plan, which describes pollution prevention measures, waste disposal methods, pollution incident response, and the implementation schedule for these items.
- Using information from the EPA application, a DEP Oil and Gas Inspector reviews the C&C Plan and conducts a mechanical integrity review to ensure compliance with DEP well construction and operating requirements.
- At the conclusion of the public comment period, DEP will review all questions and comments received and issue a Comment and Response Document which will serve as DEP's response to comments submitted during the comment period. DEP will also issue a Record of Decision at the conclusion of its permit application review.

### AVAILABILITY OF APPLICATION MATERIALS & DEPARTMENT ANALYSIS

- Roulette's application for this project is available for review on the DEP's Underground Injection Well webpage at <https://www.dep.pa.gov/Business/Energy/OilandGasPrograms/OilandGasMgmt/Pages/Underground-Injection-Wells.aspx>
- To receive an electronic copy of the final Comment and Response Document for this project, please provide contact information on the sign-up sheet at the public hearing or email your request to RA-EPOILGASDROPBOX@pa.gov.

## OPPORTUNITY FOR COMMENT

- You may submit written objections or comments on the proposed action by mail, care of Susan Price, to Pennsylvania Department of Environmental Protection, Northwest Oil and Gas District, 230 Chestnut Street, Meadville, PA, 16335.
- Anyone wishing to have their written objections or comments considered, and to receive notification of any final action by the DEP, must do so **by close of business on Tuesday, August 8, 2023**. According to Pennsylvania regulatory requirements, all written comments protesting or objecting to the proposed plan approval shall include the following:
  1. Name, address and telephone number of the person filing the comment.
  2. Identification of the proposed plan approval issuance being opposed (Clara Field #20).
  3. Concise statement of the objections to the plan approval issuance and the relevant facts upon which the objections are based.
- A public hearing to accept verbal comments has been scheduled for 5:30 p.m. on Tuesday, July 25, 2023, at the F.W. Gunzburger County Office Building Auditorium, 1 North Main Street, Coudersport, PA 16915.



Updated 7/6/2023