



July 26, 2023

Attn: Kevin Rowsey
Water Division
U.S. Environmental Protection Agency
Region 3
Via email: R3_UIC_Mailbox@epa.gov

Re: Mountain Watershed Association Comment on Permit #PAS2D061BFAY, G2 STEM LLC, Orville Higinbotham #1 well, API #37-051-20470

Dear Mr. Rowsey,

The following comments are submitted on behalf of the Mountain Watershed Association (“MWA”), home of the Youghiogheny Riverkeeper. MWA is a nonprofit, community-led, environmental organization that works to protect, preserve and restore the Indian Creek and greater Youghiogheny River watersheds. MWA represents over 1,900 members, many of whom would be impacted by the presence of an injection well within the watershed.

On June 8, 2023, the United States Environmental Protection Agency (“EPA”) proposed the issuance of a draft permit to G2 STEM, LLC, of Fairfax, VA. The permit would authorize the construction and operation of a UIC Class II-D disposal injection well. Specifically, the Orville Higinbotham #1 well, which would be located in Nicholson Township, Fayette County, Pennsylvania. A virtual public hearing was held on July 11, 2023. Approximately 70 individuals tuned in online for at least a portion of the hearing, and approximately 80 individuals attended an in-person viewing of the hearing.

In order to best protect the public and our shared natural resources, MWA strongly encourages the EPA to deny G2 STEM its permit to construct and operate the Orville Higinbotham #1 Class II-D commercial disposal injection well (“injection well”).

The following are items of particular concern.

I. Injected Fluids Have the Potential to Cause Serious Harmful Health Impacts and the EPA Should Better Inform Nearby Residents as Such

If G2 STEM’s permit application is accepted and a permit is issued by the EPA, it will result in massive amounts of fluids associated with oil and natural gas production being injected into porous geologic formations underground. The fluids associated with this injection well would primarily be brine, or salt water, as the EPA describes it,¹ which is brought to the surface when oil and gas are extracted from the earth. Per the EPA, the brine is “separated from hydrocarbons at the surface and reinjected” underground for disposal.² Thinking of brine in as simple of terms as salt water, however, is an inaccurate representation of how harmful these fluids can be.

The fluids injected back into the ground for disposal are generally “a combination of drilling mud compounds, hydraulic fracturing chemicals, well cleansing acids, and formation fluids.”³ This mixture is often laden with substances such as lithium, magnesium, zinc, and calcium chloride, which can cause serious health impacts in humans if exposed at high levels.⁴ In fact, much of the wastewater produced from oil and natural gas activities can contain high levels of radium, which is a radioactive element with carcinogenic properties.⁵ The EPA provides that a number of other naturally occurring radioactive materials including uranium, thorium, potassium-40, and lead-210 may be found in such fluids.⁶

Potentially even more concerning, however, are the recent findings that wastewater from oil and gas operations is likely laden with per- and polyfluoroalkyl substances, or PFAS. PFAS chemicals are known as “forever chemicals,” as they are highly persistent synthetic substances that do not occur naturally in nature. Per the EPA, PFAS chemicals have been associated with “carcinogenicity, . . . neurotoxicity, immune system effects, changes in body weight, changes in blood chemistry, liver and kidney toxicity, and reproductive and developmental toxicity.”⁷

¹ *Class II Oil and Gas Related Injection Wells*, U.S. Env’t Prot. Agency, <https://www.epa.gov/uic/class-ii-oil-and-gas-related-injection-wells> (last visited July 26, 2023).

² *Id.*

³ *Waste*, FracTracker Alliance,

<https://www.fractracker.org/waste/#:~:text=These%20liquids%20are%20a%20combination%20of%20drilling%20mud,materials%20%28NORMs%29%2C%20hydrocarbons%2C%20heavy%20metals%2C%20and%20other%20toxic> s. (last visited July 26, 2023) (referencing *Exemption of Oil and Gas Exploration and Production Wastes from Federal Hazardous Waste Regulations*, U.S. Env’t Prot. Agency (2002),

[https://yosemite.epa.gov/oa/eab_web_docket.nsf/Attachments%20By%20ParentFilingId/945EF425FA4A9B4F85257E2800480C65/\\$FILE/28%20-%20RCRA%20E%26P%20Exemption.pdf](https://yosemite.epa.gov/oa/eab_web_docket.nsf/Attachments%20By%20ParentFilingId/945EF425FA4A9B4F85257E2800480C65/$FILE/28%20-%20RCRA%20E%26P%20Exemption.pdf).

⁴ *Can Brine or Wastewater from Oil and Gas Operations Be More Valuable?*, US Strategic Minerals Exploration, <https://us-strategic.com/brine/> (last visited July 26, 2023).

⁵ *TENORM: Oil and Gas Production Wells*, U.S. Env’t Prot. Agency, <https://www.epa.gov/radiation/tenorm-oil-and-gas-production-wastes> (last visited July 26, 2023).

⁶ *Id.*

⁷ Dusty Horwitt, *Fracking with “Forever Chemicals,”* Physicians for Soc. Responsibility (July 2021), <https://psr.org/wp-content/uploads/2021/07/fracking-with-forever-chemicals.pdf>.

In July of 2021, Physicians for Social Responsibility (“PSR”) released the results of an investigation it conducted concerning the use of PFAS chemicals in fracking operations. Evidence accumulated in the investigation indicates that large oil and gas companies, such as ExxonMobil and Chevron, have used PFAS substances in fracking in more than 1,200 wells in the United States between 2012 and 2020.⁸ Disclosure of chemicals used in fracking operations, however, is not comprehensive, making the estimate from the PSR study likely a lowball. In Pennsylvania, specifically, PFAS have been used in wells in Chippewa Township, Donegal Township, Independence Township, Pulaski Township, and West Finley Township.⁹ Despite concerns expressed by EPA staff with regard to their use, the EPA approved PFAS for commercial use and one such chemical was even used for “unspecified purposes” as recently as 2018.¹⁰

As the site for the injection well would be located in a heavily rural region, there are many generational family farms in the area. Proximity to oil and natural gas operations has proven detrimental to farmers throughout the country for decades. Livestock “may have increased exposure to contaminated water and air as well as increased susceptibility to contaminant exposures compared to nearby humans.”¹¹ Studies conducted by a veterinarian analyzing the impacts on livestock living nearby natural gas activities have revealed dramatic impacts to health including birth defects, stillbirths, and reduced fertility.¹² Additionally, farmers in Pennsylvania, Louisiana, and Arkansas have reported health impacts and fatalities in their cattle since commencement of nearby oil and gas operations.¹³ Given the direct relationship between the health of livestock and the success of a farming operation, health impacts to livestock have the potential to completely upend families’ ways of life. The permit for the injection well should be denied when the large concentration of farms in the area are taken into account.

The EPA should be more straightforward in the language it uses to describe the fluids injected underground when engaging with the public, noting the radioactivity and carcinogenic properties of the fluids rather than simply referring to them as “wastewaters” or “brine.” Additionally, the EPA should require applicants to show there will be no potential for exposure to PFAS chemicals. The high potential for exposure to these radioactive substances and the increased risk to health should always be taken seriously, but should be assessed on an

⁸ *Id.*

⁹ Kristina Marusic, *See Where Toxic PFAS Have Been Used in Pennsylvania Fracking Wells*, Env’t Health News (Oct. 14, 2022), <https://www.ehn.org/pennsylvania-pfas-fracking-2658440566.html>.

¹⁰ Horwitt, *supra* note 7.

¹¹ IB Slizovskiy, et al., *Reported Health Conditions in Animals Residing Near Natural Gas Wells in Southwestern Pennsylvania*, 50(5) J. Env’t Sci. & Health 473 (2015), <https://pubmed.ncbi.nlm.nih.gov/25734823/>.

¹² Amy Mall, Sharon Buccino & Jeremy Nichols, *Drilling Down*, Natural Res. Def. Council (Oct. 2007), <https://www.nrdc.org/sites/default/files/down.pdf>.

¹³ Amy Mall, *Oil and Gas Impacts on Livestock Health?*, Natural Res. Def. Council (May 2009), <https://www.nrdc.org/bio/amy-mall/oil-and-gas-impacts-livestock-health>.

even stricter level in areas with environmental justice concerns such as Nicholson Township.

II. Quality of Life Is Often Impacted Via Issues Such as Increased Truck Traffic and EPA Should Mitigate the Potential for Public Nuisances

With injection wells that have already been permitted, residents nearby have noted impacts to their daily quality of life. One of the major impacts that residents experience is an increase in truck traffic on the roads nearby a site location. With some injection wells, operators have predicted six to eight trucks hauling wastewater to visit a site in as little as one hour.¹⁴ In Plum Borough, residents have complained of increased truck traffic impacting their community.¹⁵

Increased truck traffic causes damage in a number of ways including but not limited to safety concerns, increased noise, and wear and tear on the roads. Many of the rural roads surrounding the proposed site location for the injection well were not designed and constructed to accommodate the weight of a truck hauling fluid into the site on a regular consistent basis. As such, residents living nearby may experience an increased deterioration of the public roadways.

III. The EPA Should Deny this Permit Due to the Likelihood of Water Contamination of Both Public and Private Water Supplies

When brine and other fluids are forcefully pushed over 1,000ft underground, it is not clear what all of the potential outcomes could be. First and foremost, the exact state of the geology under our feet is never clear. Even seasoned geologists and engineers admit as much, with Stefan Finsterle, a hydrogeologist with Lawrence Berkeley National Laboratory specializing in how fluid flows through rock layers, stating, “There is no certainty at all in any of this, and whoever tells you the opposite is not telling you the truth.”¹⁶

A. Contamination at already operating wells indicated a high likelihood that similar failures may arise with the proposed injection well.

Injection wells have been known to cause a myriad of problems throughout the United States. In the early 1990s, twenty injection wells in South Florida, which have been described as “the nation’s most stringently regulated disposal wells” failed and sewage that was only partially

¹⁴ *Injection Well Safeguards Vital*, The Intelligencer Wheeling News-Register (May 14, 2019), <https://www.theintelligencer.net/opinion/editorials/2019/05/injection-well-safeguards-vital/>.

¹⁵ Kiley Koscinski, *Environmental Groups Join Plum Borough Council in Fight Against Second Gas Wastewater Injection Well*, Allegheny Front (Mar. 11, 2022), <https://www.alleghenyfront.org/environmental-group-joins-plum-borough-council-in-fight-against-second-gas-fracking-wastewater-injection-well-protect-pt/>.

¹⁶ Abraham Lustgarten, *Injection Wells: The Poison Beneath Us*, ProPublica (June 21, 2012), <https://www.propublica.org/article/injection-wells-the-poison-beneath-us>.

treated was found to have contaminated aquifers in the area.¹⁷ In 2010, injected fluid from a well rose to the surface and leaked into a dog park in Los Angeles.¹⁸ And in June 2014, a study of conditions surrounding an injection well in West Virginia found that waters downstream of the injection well showed elevated specific conductance and concentrations of elements such as radium, strontium, barium, and chloride compared to waters upstream of the site.¹⁹ And these examples are but a few of those which have been documented throughout the United States. Mario Salazar, a former engineer with the EPA's underground injection well program has stated, "In 10 to 100 years we are going to find out that most of our groundwater is polluted."²⁰

Looking closer to home in southwest Pennsylvania, in Plum Borough, Penneco Environmental Solutions LLC operates an injection well, the Sedat 3A well. In July 2021, a water supply complaint was filed and the well operator failed to notify the DEP within 24 hours of receiving notice of the complaint.²¹ The operator did note that they corresponded with the EPA regarding the water supply complaint, but Pennsylvania regulators were left in the dark.²² Given that injection wells are permitted by both the DEP and EPA, there is plenty of room for errors in communication. Due to the significance and seriousness of complaints regarding water supplies, however, assurances should be made that such issues would not occur if G2 STEM's permit were to be issued.

B. The casings used in injection wells have been known to have structural integrity issues and do not adequately address the long-term potential impacts associated with the injected fluid.

In the draft permit released by the EPA, Part III addresses construction requirements. One such requirement provides that G2 STEM shall "ensure that the casing and cement used in the Injection Well are designed for the life expectancy of the Injection Well."²³ In a review of more than 220,000 injection well inspections, structural integrity violations were issued for one out of every six injection wells between 2007 and 2010.²⁴ The review also showed that injection wells

¹⁷ *Id.*

¹⁸ *Id.*

¹⁹ Denise M. Akob, et al., *Wastewater Disposal from Unconventional Oil and Gas Development Degrades Stream Quality at a West Virginia Injection Facility* 50(11) *Env't Sci. & Tech.* 5517 (May 9, 2016), <https://pubs.acs.org/doi/full/10.1021/acs.est.6b00428>.

²⁰ Lustgarten, *supra* note 16.

²¹ *PA Permit Violation Issued to PENNECO ENVIRONMENTAL SOLUTIONS LLC in Plum Boro, Allegheny County*, SkyTruth Alerts, <https://alerts.skytruth.org/report/86cc9634-ee01-3082-82a2-ba9440d5d076/> (last visited July 26, 2023).

²² *Id.*

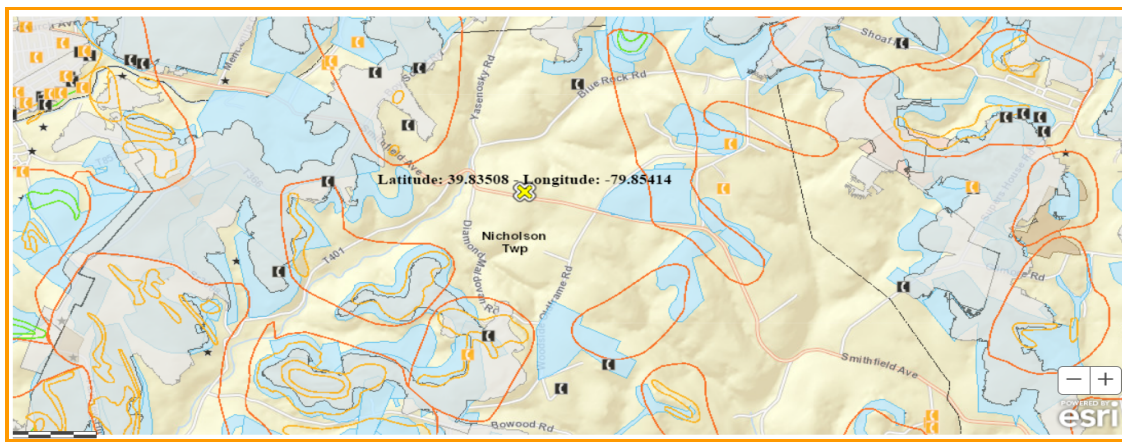
²³ Underground Injection Control Permit Number PAS2D061BFAY Authorization to Operate a Class II-D Injection Well, U.S. Env't Prot. Agency Region III, https://www.epa.gov/system/files/documents/2023-06/PAS2D061BFAY_DRAFT_PERMIT.pdf.

²⁴ Lustgarten, *supra* note 16.

frequently operate “in violation of safety regulations and under conditions that greatly increase the risk of fluid leakage and the threat of water contamination.”²⁵ Within the EPA’s draft permit, there are no definitions provided to decipher the terms and phrases used throughout. As such, it is unclear what the EPA deems to be the “life expectancy” of the injection well. Regardless, the casing and cement used in the construction of the injection well should be designed for a period significantly greater than the life expectancy of the physical structure of the well. Many of the constituents found in fluids associated with injected wells have a half life of thousands of years. Impacts from improper construction of the injection well have the potential to impact life for residents and the environment around the proposed site for centuries to come, even after the injection well has reached the end of its life.

C. The large extent of abandoned mine workings in the immediate vicinity of the proposed location increases the risk of injected fluid migration.

Additionally, the site of this proposed well is surrounded by numerous abandoned coal mines. The figure below, a map generated by the Pennsylvania DEP’s mapping tool,²⁶ illustrates this clearly. The proposed site of the injection well is marked with a yellow “x” and the latitude and longitude coordinates are written above. According to DEP’s materials, the blue and gray areas show the areas of underground mines. The red lines show land recorded in AML (Abandoned Mine Land) Inventory, a collection of areas where surface features of abandoned mines are present. The telephone icons signify mine-related environmental complaints. For example, there appears to be over ten complaints that have been filed within about one mile radius of the site, reporting issues like, “mine subsidence” and “pollutional discharges” coming from the abandoned mines.



The heavy extent of historical mining brings significant and unnecessary risks with injection well construction. For example, if seismic testing is necessary, the impacts could easily cause these

²⁵ *Id.*

²⁶ *eMap PA*, Pa. Dep’t Env’t Prot., accessible at <https://www.depgis.state.pa.us/eMapPA/> (last visited July 26, 2023).

already unstable areas to have significant subsidence. This could result in irreparable harm to people's homes and to the local waterways and ecology. Also, if the injection well does leak, it is impossible to predict how the contaminants would move through the aquifer because there has been no evaluation of the hydrologic connectivity between the mines and the proposed site.

D. The proposed location for the injection well sits in close proximity to a number of private water supplies as well as major sources of public drinking water.

The proposed location for the injection well lies less than one half of a mile, approximately 1,500ft to be more exact, from a waterway called Jacobs Creek. Jacobs Creek is a 5.52-mile-long tributary of the Monongahela River in Fayette County, Pennsylvania. The Monongahela serves as a source of drinking water for public water utilities and their customers in both West Virginia and Pennsylvania. It is a part of the Ohio River Basin, which serves approximately 5 million customers.²⁷ Additionally, the Monongahela flows into the Mississippi River, which provides drinking water to millions more residents throughout the United States.

Moreover, the proposed location also lies in proximity to a number of properties with private wells and springs, which supply water to individuals' and families' homes. During the July 11th hearing, numerous commenters reported that their private water supplies were not included in the application materials. As discussed earlier, there are many farms in the area that have been in local families for generations. Ensuring adequate water supplies for these operations is critical. These families rely on their private water supplies, such as wells and springs on their property, for more than just drinking—they use the water to support their animals and water their crops. An impact to the water supplies on these properties would result in deleterious impacts to these families' ways of life.

Given the well documented history of leaks, failures, and other violations at injection well facilities throughout the country, issues with construction requirements for the long-term viability of this site, and the presence of abandoned mine workings in the vicinity of the proposed site, the risk to drinking water supplies is severe. While the EPA does detail injection well monitoring requirements for the proposed well in the draft permit, it does not include monitoring requirements for surface waters, groundwater, or private water supplies. Such monitoring requirements should be included and detailed in the permit, if one were to be issued. However, in consideration of the proposed site's proximity to both private water supplies and waterways which serve as source water for millions of Americans, a final permit should not be issued for an injection well in this location.

²⁷ *The Ohio River and Its Watershed*, Ohio River Found., <https://ohioriverfdn.org/ohio-river/quick-facts/> (last visited July 26, 2023).

IV. The Area of Review (“AOR”) and Injectivity Test Are Inadequate and the EPA Should Require Additional Analyses

With other wells used for the injection of wastewater throughout the United States, there have been instances in which injected fluids have surfaced through nearby abandoned wells. There is an abandoned well titled number “051-90111” inside the ¼ mile radius of the proposed site. This not only increases the risk of waste migration if the liner fails, which is likely over time, but also shows that G2 STEM was not thorough enough in its AOR review and may have missed other critical details in the area.

When discussing the potential for catastrophic communication of toxic radioactive waste between the proposed facility and other channels in the immediate area, the Yasenosky 2 blowout must be mentioned as well. This was an example of active fracking that jumped to an abandoned well and caused a blowout. Such an event could happen at the Nicholson Injection Well and the produced water blowout would pose a significant health risk to the environmental justice community around the proposed site. For wastewater of this makeup, with these health risks, the AOR review of ¼ mile, which already has been shown not to have been conducted thoroughly enough, is insufficient and should be increased to a ½ mile before any more work on this development can move forward.

In addition, this site has not properly attained the safety requirements necessary to comfortably approve the development. The injectivity test suggests that fractures from drilling may have caused a pressure drop, which indicates a high likelihood of gas migration if the injection well is approved. One potential reason for the pressure drop listed in G2 STEM’s application was the opening of a pre-existing fracture from the original fracking operation present at the site.²⁸ However, the application does not reach a final conclusion as to what actually was the cause. G2 STEM should be required to determine the cause of the pressure drop, considering all potential causes, such as naturally-occurring fractures, opening of pre-existing fractures, and opening of previously blocked perforations. This analysis should also be accompanied by a thorough review of the surrounding geology to ensure that the pressure drop is not due to injected fluid migrating to nearby abandoned wells, waters of the United States, or other areas which could cause substantial impacts to residents’ water supplies and property.

V. The Manner of the Public Hearing Was Insufficient and an In-Person Public Hearing Should Be Held

As previously mentioned, the EPA held a virtual public hearing on July 11, 2023, and approximately 150 concerned residents tuned in to listen and/or comment on the proposed

²⁸ Don Tron, Fluid Moving Solutions, LLC, *G2 STEM EPA Permit Request Report* at 40, https://www.epa.gov/system/files/documents/2023-06/G2%20STEM_HIGINBOTHAM_PERMIT%20APPLICATION.pdf.

permit. Under the Code of Federal Regulations 40 C.F.R. § 25.5, however, “[h]earings must be held at times and places which, to the maximum extent feasible, facilitate attendance by the public.”²⁹ Additionally, the public participation requirements imposed by the federal regulations are “subordinate to any more stringent requirements found elsewhere in this chapter or otherwise imposed by EPA, State, interstate, or substrate agencies.”³⁰

While many residents of the United States now have access to the internet and computers at home, Fayette County still falls behind the rest of the state of Pennsylvania in percentage of residents with access.³¹ The U.S. Census Bureau provides that approximately 80% of Fayette County residents have households with a broadband internet subscription.³² This leaves approximately 20% of the population without means to access a virtual hearing.³³ Given that there were no weather-related emergencies and the COVID-19 infection risk for Fayette County was low during the time in which the public hearing was to be held,³⁴ there is no reason that the EPA could not have held an in-person public hearing. An in-person public hearing would have been the most feasible means necessary to facilitate attendance by the public in the most equitable manner.

VI. The Proposed Site Lies Within an Environmental Justice Area and Additional Public Participation Safeguards Should Be Implemented

In Pennsylvania, the Department of Environmental Protection (“DEP”) defines an environmental justice area (“EJ area”) “as any census tract where 20 percent or more individuals live at or below the federal poverty line.”³⁵ When utilizing the DEP’s Environmental Justice Area Viewer, one can see that the entirety of Nicholson Township, where the injection well is proposed to be located, is considered an EJ area.³⁶ EPA staff conducted an Environmental Justice Screening on March 15, 2023, per the Administrative Record Index associated with the permit application.³⁷

²⁹ 40 C.F.R. § 25.5(c) (2023).

³⁰ *Id.*

³¹ *QuickFacts: Fayette County, Pennsylvania*, U.S. Census Bureau, <https://www.census.gov/quickfacts/fact/table/fayettedepennsylvania,PA/PST045222#:~:text=Households%20with%20a%20computer%2C%20percent%2C%202017-2021%2084.9%25%2090.9%25,Households%20with%20a%20broadband%20Internet%20subscription%2C%20percent%2C%202017-2021> (last visited July 26, 2023).

³² *Id.*

³³ *Id.*

³⁴ *Covid Data Tracker*, Ctrs. for Disease Control & Prevention, https://covid.cdc.gov/covid-data-tracker/#maps_new-admissions-rate-county (last visited July 26, 2023).

³⁵ *PA Environmental Justice Areas*, Pa. Dep’t Env’t Prot., <https://www.dep.pa.gov/PublicParticipation/OfficeofEnvironmentalJustice/Pages/PA-Environmental-Justice-Areas.aspx> (last visited July 26, 2023).

³⁶ *Environmental Justice Areas Viewer*, Pa. Dep’t Env’t Prot., <https://padep-1.maps.arcgis.com/apps/webappviewer/index.html?id=f31a188de122467691cae93c3339469c> (last visited July 26, 2023).

³⁷ *G2 STEM UIC Permit #PAS2D061BFAY “Orville Higinbotham #1” Administrative Record Index*, U.S. Env’t Prot. Agency Region III, https://www.epa.gov/system/files/documents/2023-06/Admin_Record_Index.pdf (last visited July 26, 2023).

The results of this screening have not been shared with the public and should be prior to issuance of a final permit. It is MWA's belief that this is an environmental justice community and as such, the community is entitled to an additional hearing from the EPA before permit issuance. Please accept this as a formal request on this permit application for an additional in-person environmental justice hearing.

VII. A Federal Indictment Against the Owner of G2 STEM Provides Zero Assurances that All Pennsylvania and Federal Laws Will Be Adhered to

On June 28, 2023, the United States Department of Justice issued a federal indictment of Frederic Gumbinner, the owner of G2 STEM. The indictment alleges that Gumbinner engaged in conspiracy to bribe the Sheriff of Culpeper County, Virginia. Specifically, the indictment set out five counts of criminal violations, including one count of conspiracy, one count of honest services mail and wire fraud, two counts of bribery concerning programs receiving federal funds, and one count of aiding and abetting. This indictment provides insight into the approach which Gumbinner takes toward business, and does not provide assurances that his company will strictly adhere to the laws of both Pennsylvania and the federal government with respect to this proposed injection well.

VIII. Issuance of the Permit Would Violate Fayette County Commissioners' Resolution on Injection Wells

On July 18, 2023, the three county commissioners for Fayette County, Dave Lohr, Vincent A. Vicites, and Scott Dunn, issued a comment synthesizing their thoughts on the application, and on July 20, 2023, the three signed an injection well resolution.³⁸ In the comment submitted by the commissioners, concerns were cited relating to community health, local water supplies, nearby abandoned wells, interaction with underground mines, public roads, contamination and cleanup, and insurance.³⁹ The commissioners ended their comment by urging the EPA not to issue a permit for the well, noting that the proposed location is not proper for a potential injection well.⁴⁰

In the resolution signed by the commissioners, many of the same concerns were noted. There was a particular focus on protecting drinking water supplies and the potential impacts that placing an injection well could have in an area that has experienced heavy coal extraction.⁴¹ With significant opposition from local concerned residents⁴² and the elected officials of the region, it is

³⁸ *Commissioners Pass Resolution Opposing Injection Well Sites*, Fayette County, Pa. (July 20, 2023), <https://www.fayettedcountypa.org/CivicAlerts.aspx?AID=374>.

³⁹ *Id.*

⁴⁰ *Id.*

⁴¹ *Id.*

⁴² Please refer to the comments submitted by members of the public at the public hearing held on July 11, 2023, as well as the written comments submitted by members of the public up to July 26, 2023.

extremely evident that this proposed injection well is not in the best interests of the people of Nicholson Township.

For the foregoing reasons, MWA respectfully requests that the EPA deny G2 STEM, LLC its permit for construction and operation of the Orville Higinbotham #1 Class II-D commercial disposal injection well.

Regards,

Madison Hinkle, Esq.
Community Advocate
Mountain Watershed Association