

Action Alert

EPA public comment period

All Concerned Weld and Larimer County Citizens: :

On June 6, 2011 the EPA held it's public hearing giving people the opportunity to voice their concerns to the EPA about Powertech's permit application to reinject groundwater from an aquifer pump test. However, during the meeting it was stated a number of times that people thought their past comments were still valid for this permit hearing. The EPA responded that this is treated as a new permit and the previous comments did not apply. After many more questions as to whether the comments still applied, the EPA agreed to enter the previous comments into the record for this hearing but to ensure that your comments are recorded, **please take the time and resend or write new comments before the Friday deadline.**

The proposed permit is the third draft of a permit for a Class V injection well that will be used to reinject groundwater pumped during an aquifer pump test from the Upper Fox Hills Formation back into the same formation. The proposed injection well is located in the NE quarter of Section 33 in Township 10 North and Range 67 West Weld County, Colorado.

The full EPA Public Notice can be found here:

http://www.epa.gov/region8/water/uic/EPA_Public_Notice_Powertech_Central_UIC_Class_V.pdf

Please take time to resend or write out your statements now so you can express your concerns.

Listed below are a few of the concerns we have, you may use these and/or add some of your own:

EPA needs to review all relevant information:

1. Powertech conducted previous pump tests in the area, the data from which formed the basis for the company's application materials asserting that the newly proposed test would not harm the aquifer. EPA needs to review this data as part of its permit review.
2. The area in which Powertech proposes to conduct its new pump test was extensively drilled in the late 1970's and early 1980's when well abandonment and sealing procedures were not protective. Indeed, the evidence shows that wells in the area were

not properly sealed during this era. Yet, EPA has not required Powertech to investigate or otherwise ensure the integrity of these historic wells. Before issuing any permit, EPA should require Powertech to investigate these wells and make the results available to the public.

EPA needs to fully involve the public:

3. EPA proposes to review the data from the newly proposed pump test after it is conducted, but before reinjection is allowed, in order to ensure aquifer protection. However, nowhere does the EPA provide any opportunity for the public to review this information prior to the reinjection. In this way, EPA effectively denies the public any opportunity to review what it admits is the most relevant information necessary to ensure protection of the aquifer.

EPA needs to review all impacts:

4. EPA has failed to conduct any review of the potential impacts associated with the pump test itself. Instead, EPA focuses solely on the potential impacts of the reinjection activities. In order to fulfill its duties to the public and for the protection of the aquifer, EPA should conduct a full review of the impacts associated with the pumping as well as the reinjection.

The EPA will continue accepting comments from the public on this permitting action. The public comment period closes **Friday, June 10, 2011**. Please send your comments and concerns to the EPA at:

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or

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