**Comment on Permit Request for Deep Rock Injection Well**

When will the people at the Division of Oil and Gas Resource Management start listening seriously to the residents of Washington County about injection wells?

We strongly oppose the approval of a permit for Deep Rock Disposal to establish an injection well at American Growers #4, section 4, in Warren Township in Washington County. We want our voices to be heard, and we need our election officials to convey our concerns to the Division.

In researching this request in the context of other requests for permits from Deep Rock, we have come up with several questions that need to be addressed before this request is approved:

1. It appears that this is the same request that was made to the Division in 2021. Why was that request not approved, or was it and the drill site was never established?
2. I just received a report that brine waste is being delivered by rail to Parkersburg WV;,trucks are picking up this material at the train depot and delivering it to Deep Rock’s site just outside Marietta. I have asked Director Vendel if Deep Rock is authorized to do that.

3. Inspection reports indicate that a railroad spur has been put in at this site which is adjacent to a barge dock. Will brine water, aka production waste, be shipped in by barge to this site? And if so, has the U.S. Coast Guard been informed that this material will be transported on the Ohio River?

4. Will this brine water be piped from the site to another site just off Route 676, through a residential area of the City of Marietta (Harmar Hill)?

5. Deep Rock plans to store brine waste in two 25,000 bbl (that’s over 2 million gallons) tanks very near the Ohio River. Is this a tolerable risk to a river that provides drinking water to thousands along its path

6. Why was the public announcement buried in the classified ad section of the Marietta Times? When a utility that is operating in Washington County makes a public announcement, it appears in a large space (quarter or half page) in the body of the newspaper.

Apart from these questions, numerous issues still persist regarding injection wells and this request in particular.

There is serious concern about the safety of the extensive drilling of injection wells in Washington County.

-Our county leads the state in the volume of brine water injected into its grounds. This excessive brine water is damaging some production wells of independent oil & gas operators. Bob Lane and Bob Wilson, two such operators, have filed a law suit against Deep Rock and other injection-well companies alleging extensive damage to their wells. This case has received a favorable ruling on appeal and is now in a Washington County court. It would seem reasonable to defer the approval of any further injection wells and even suspending injection-well requests throughout the area until this case is settled. Furthermore, the excessive amount of brine water in the county is threatening aquifers; the Redbird incident of a few years ago is evidence of that. We are still waiting for a report on the Veto Lake incident two years ago where raw petroleum appeared on the lake (was this due to excessive brine water blowing off an improperly capped old oil well?).

Brine water contains toxic substances that are carcinogenic, PFAS chemicals, volatile organic compounds, and most of brine water is radioactive (Radon 222). Justin Nobel in his book, *Petroleum 238,* documents the health risks of brine water based on reports from all over the country. Operators of these injection wells point out that only about one per cent of brine water contains these toxic substances, but when we are dealing with millions of gallons, the amount of this toxicity in non-trivial.

In recent days we have experienced earthquakes in the area (January 28, 2025 near Reno). There were 39 earthquakes in Washington County within a week. It is likely that the excessive amount of brine waste injected into the ground is migrating and affecting geological faults. We need more time to study this issue.

Another health and safety risk in our county is the "parade" of brine trucks traveling our roads and streets. From our church office on Third & Putnam Sts in Marietta we can see a brine truck (these trucks are only marked as "brine" not brine water, production waste, or a more accurate description of their contents) every 20 minutes or so as they pass through downtown Marietta. A year and half ago a brine truck went off the road on I77 (on a summer Saturday evening) just north of Parkersburg WV; the driver was killed, and we never heard the results of any investigation of the truck or its contents and where the truck was coming from or going to.

Deep Rock and other disposal companies have a questionable record of safety on injection wells. Four injection wells in Athens County were recently suspended due to problems, and one well there was plugged.

The high pressure under which brine waste in injected can affect aquifers by migrating along fault lines. A few years ago brine waste from the Redbird #4 well migrated out of the injection zone ultimately to the Ohio River. We do not need a repetition of this event.

We would respectfully request a public meeting to be held by the Division in Washington County about this request for a permit from Deep Rock. This should be held before any approval of the permit request is granted. We, furthermore, request that Eric Vendel, the Director of the Division, be present at this meeting and that questions from the public will be responded to—unlike what happened at the public meeting two and half years ago at St. Ambrose Church about the Arrowhead Injection Well when our County Commissioner, Charlie Schilling, had to go to Columbus to get questions answered.

Dr. George Banziger

Muskingum Township (Washington County)

February 6, 2025