

Ryan Hancharick
Source Water & UIC Section
U.S. EPA Region 3

October 16, 2025

Re: Comment on Permit #PAS2D041BBEA, Columbia Gas, Underground Injection Control Authorization to Operate a Class II-D Injection Well.

Dear Mr. Hancharick,

The below signed organizations in Southwestern Pennsylvania join the Beaver County Marcellus Awareness Community (BCMAC) to submit comments on Underground Injection Control Permit Number PAS2D041BBEA. We know that clean air and water are critical to the health, vitality and economic prosperity of our communities. We oppose this permit authorizing the Columbia Gas Injection Well to inject fluids from unconventional wells drilled to frack gas from shale, due to the risk of both surface and groundwater contamination and risks to public health and safety.

The Safe Drinking Water Act (SDWA) permitting Class II UIC wells provides that they are permitted for fluids from conventional oil and gas development. This injection well proposes to accept *unconventional* frack fluids and is therefore in violation of federal regulations. Moreover, the Safe Drinking Water Act provides that “radioactive waste” can only be injected into Class I injection wells and defines “radioactive waste” to include “any waste which contains radioactive material in concentrations which exceed those listed in 10 CFR part 20, appendix B, table II column 2.” Radium-226 and radium-228, individually and combined, appear in the table with a limit of 60 picocuries per liter. 10 C.F.R. pt. 20, app. B tbl. 2, col. 2. Most, if not all, produced water originating in the Marcellus and Utica shales will meet or exceed this threshold, making this material “radioactive waste” as defined by the Safe Drinking Water Act. Accordingly this waste should only be injected into Class I disposal wells, and should not be received by the proposed Class II well. At a very minimum, the permit must require sufficient monitoring to ensure the well does not receive produced water with radionuclide levels that meet the Safe Drinking Water Act’s threshold for “radioactive waste.”

In a two-part audit of records, the U.S. Government Accountability Office found that the EPA is failing to protect U.S. drinking water sources from fracking-related activities like waste disposal via injection wells. Short-term and long-term monitoring are both lax, and record-keeping varies widely from state to state. The EPA neither mandates nor recommends a fixed list of chemicals for monitoring on the grounds that injection fluids can vary widely in composition. Disposal of oil and gas waste via injection wells is, in fact, subject to regulation under the Safe Drinking

Water Act, but, in practice, no one knows exactly what the waste contains, and regulations are deficient. Therefore, the EPA cannot credibly state that the design and integrity of this injection well is sufficient, and we again emphasize that disposal of fluids from unconventional oil and gas operations is prohibited under the SDWA.

Furthermore, this injection well is 858 feet from dwellings. It's also 1210 feet from Brush Run, a local stream in the Ohio River Basin that flows into the North Fork Little Beaver Creek, which then flows into the Ohio River. North Fork Little Beaver Creek is also a Pennsylvania tributary to the main Little Beaver Creek, flowing through Beaver County and near the town of Darlington before entering Ohio. It is a designated Wild and Scenic River in Ohio. Contamination would be devastating. The antidegradation policy established by the Clean Water Act requires that "the level of water quality necessary to protect [the stream's] existing uses shall be maintained and protected." The same antidegradation policy also requires that sufficient water quality must be maintained "to support the protection and propagation of fish, shellfish, and wildlife and recreation on and in the water."

In addition to federal regulation, the Commonwealth of Pennsylvania promises in its constitution "a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment" through its Environmental Rights Amendment. These natural resources are "the common property of all the people," and it is the duty of the Commonwealth to "conserve and maintain them." The Columbia Gas Injection Well gambles with our right to pure water and disregards resident opposition to this project.

Approving this permit would disregard the Commonwealth's constitutional duty under Article I, Section 27 to protect shared natural resources for present and future generations and would violate both the Safe Drinking Water Act and the Clean Water Act. The rudimentary approach of this permit, with no mention of monitoring or a plan for regular inspections and testing, is evidence of the disregard of Columbia Gas for the preservation of public and environmental health. Columbia Gas cannot be expected to ensure timely action in the event of a contamination or system failure. Given the proximity of this injection well to residential homes and waterways, the risks are simply too great to overlook. Clean air and water are the foundation of healthy, thriving communities, and once contaminated, they cannot easily be restored. We respectfully urge the EPA to deny this permit and to uphold its responsibility to safeguard the health, safety, and environmental integrity of Beaver County residents and the broader Ohio River Basin.

Sincerely,

Barbara W. Brandom
MD Committee Member
[Concerned Health Professionals of Pennsylvania](http://ConcernedHealthProfessionalsofPennsylvania.org)

Gillian Graber
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