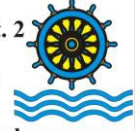




HydroQuest

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March 11, 2014

Attention: Mr. James Ferreira
U.S. Environmental Protection Agency
Water Protection Division -- Safe Drinking Water Branch
Ground Water and UIC Section
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960

Re: Underground Injection Control Permit Application for EPA FLI0047; Disposal of Oil & Gas Field Wastewater in the Floridan Boulder Zone (Oldsmar Formation) will Degrade Aquifer and Spring Water Quality

Dear Mr. Ferreira,

This letter is provided on behalf of Preserve Our Paradise, Inc. to express their concerns with the Draft Permit EPA Region 4 has issued to the Dan A. Hughes Company, L.P. for a "saltwater" disposal injection well located on Township-Range-Section 49S-28E-22 of Collier County, Florida. I am a President of an environmental consulting firm (HydroQuest) with expertise in hydrogeology, karst hydrology, hydrology, geology, photointerpretation, and Geographic Information System map making and analyses. The concerns raised in this letter apply equally to any and all plans for waste disposal into the Oldsmar Formation, regardless of the type of contaminant waste material proposed for subsurface injection. We provide rationale to 1) revoke the Hughes injection well permit, and 2) place a moratorium on all injection well permit applications (where contaminant injection has not occurred) until a draft environmental impact statement (DEIS) has been completed with full public participation in scoping sessions with subsequent review and comment on the DEIS.

Wastewater injection into Oldsmar Formation (i.e., boulder zone of the Lower Floridan Aquifer) by the Hughes Company, or any other entity, will result in degrading the existing brackish quality of this water that, after natural circulation and upward mixing with upper Floridan aquifer waters and subsequent treatment, will be needed to meet Florida's growing and future water supply demands. USGS (2014) stresses the importance of Floridan aquifer system water as a supplemental water supply source capable of meeting local and state public water supply needs. Similarly, Bernstein (2000) accurately characterizes Floridan aquifer water as South Florida's "*reserve source of drinking water*". Furthermore, the karstic nature of water flow in the highly permeable boulder zone is likely to flow to major onshore and offshore springs that currently support existing water demands and ecotourism. While upward mixing and dilution may be capable of assimilating some oil and gas well wastewater, the current injection concept is misguided, fails to adequately address the transport and fate of injected contaminants, and should be stopped immediately.