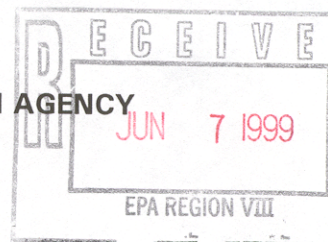




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



JUN 01 1999

REPLY TO THE ATTENTION OF:
WU-16J

John Centofani, Area Environmental Specialist
MarkWest Hydrocarbons Inc.
P.O. Box 575
South Shore, Kentucky 41175

Re: Well Classification for Two Propane Storage Wells Located in Painesville, Ohio

Dear Mr. Centofani:

The United States Environmental Protection Agency (USEPA), Region 5 Underground Injection Control (UIC) Branch has reviewed your letter dated March 1, 1999, in which you asked what type of UIC permitting would be required, if any, for two wells located in Painesville, Ohio. The two wells are described in your March 1, 1999, letter as dual purpose injection and withdrawal wells, which are used to move both propane and brine into and out of subterranean caverns in a salt formation.

As you know, the Ohio Department of Natural Resources (Ohio DNR) and the Ohio Environmental Protection Agency (Ohio EPA) have been delegated primary enforcement authority to administer the UIC program in Ohio. The Ohio DNR administers the UIC program for Class II and III injection wells, while the Ohio EPA administers the UIC program for Class I, IV and V injection wells. In response to your letter, my staff contacted these State agencies to ensure that all programmatic areas of authority were properly consulted in this well classification decision.

Elsewhere in Region 5, this type of operation occurs with no requirement for UIC permits. In Marysville, Michigan, for instance, there are nine subterranean salt cavern injection and withdrawal wells which are used for storage of propane and other commercially viable hydrocarbons which are gaseous at standard temperature and pressure (60 ° F, 1 atmosphere). As you can see from the enclosed memorandum dated February 2, 1994, USEPA Headquarters determined that the Marysville wells are not UIC wells and are excluded from the UIC program at Title 40 of the Code of Federal Regulations (40 CFR), Section 144.1(g)(2)(iv).

The three agencies (Ohio DNR, Ohio EPA, and Region 5) agree that the exclusion afforded to the Marysville, Michigan facility is applicable here. Thus, pursuant to 40 CFR §144.1(g)(2)(iv), the two cavern wells at the Painesville, Ohio, facility are not underground injection wells subject to the requirements of the Federal UIC program. We do expect that if MarkWest Hydrocarbons, Inc. acquires them, these wells will be operated in a manner which is protective of human health

and the environment. Further, the Ohio DNR may require proper construction and plugging of these wells under its authority in the State of Ohio. If you have any questions about this matter, please feel free to contact Nathan Wisler of my staff at (312) 353-9569. Questions for the State may be directed to Dennis Crist (Ohio DNR) at (614) 265-6926, or Lindsay Taliaferro (Ohio EPA) at (614) 644-2771.

Sincerely yours,

Valerie J. Jones, Chief
Underground Injection Control Branch

Enclosure

cc: Dennis Crist, Ohio Department of Natural Resources (w/encl.)
Lindsay Taliaferro, Ohio Environmental Protection Agency (w/encl.)