

UIC Enforcement: U.S. Environmental Protection Agency and Allegan County, Michigan Class II Injection Well Operator Enter into Consent Order



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The United States Environmental Protection Agency (“EPA”) and Bruce Alan Enterprises, Inc., (“BAEI”) entered into a Consent Agreement and Final Order (“CAFO”) addressing alleged violations of certain Safe Drinking Water Act (“SDWA”) regulations. See Docket No. SDWA-05-2021-0002.

The CAFO states that BAEI is authorized to operate a Class II injection well (“Well”) in Allegan County, Michigan.

The Well is permitted to inject underground saltwater from production wells pursuant to an SDWA permit. The Well is subject to the underground injection control programs set forth at 40 C.F.R. Parts 124, 144, 146, 147 Subparts A and X, and 148.

An EPA credentialed inspector is stated to have inspected the Well on July 31, 2019. A report is stated to have been provided to BAEI on August 10, 2019. The company is stated to have provided a response to an EPA noncompliance notification.

BAEI submitted a response to an EPA Information Request on June 12, June 15, and June 16 of 2020. Further, the CAFO provides that BAEI has completed the following as of October 23, 2020:

1. Immediately stopped injecting unauthorized sources of injection fluids.
2. Closed off the annulus to ensure that the space between the tubing and the long string casing is filled with a fluid capable of inhibiting corrosion.
3. Began using calibrated gauges for all monitoring and will replace with new gauges as needed.
4. Began measuring and recording injection pressure, annulus pressure, flow rate and cumulative volume weekly at the well site.

The CAFO alleges the following violations:

- Failure to Accurately Monitor and Record Pressure
- Submission of Inaccurate Reports
- Failure to Maintain Mechanical Integrity
- Failure to Make Required Notification
- Failure to Properly Operate
- Injection of Unauthorized Fluids

A civil penalty of \$5,000 is assessed.

A copy of the CAFO can be downloaded [here](#).