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Underground Injection Control/Safe Drinking Water Act Enforcement: U.S. Environmental Protection Agency and Arenac County, Michigan, Production Well Operator Enter into Consent Agreement

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The United States Environmental Protection Agency (“EPA”) and Sterling Operators, Inc., (“Sterling”) entered into a July 16th Consent Agreement and Final Order (“CAFO”) addressing alleged violations of the Safe Drinking Water Act (“SDWA”) Underground Injection Control Regulations. See Docket No. SDWA-05-2021-0004.

The CAFO provides that Sterling is authorized to operate Class II injection wells in Arenac County, Michigan.

SDWA permits are stated to authorize the underground injection of saltwater from production wells owned and operated by Sterling into certain specified wells.

EPA is stated to have sent Sterling a noncompliance notification based on a review of records for two specified wells. Sterling is stated to have provided a written response to the EPA notification.

The violations alleged in the CAFO include:

- Failure to properly operate and maintain the wells
- Failure to accurately record annulus pressure
- Submission of inaccurate reports

A civil penalty of \$35,252 is assessed. Further, the CAFO provides that Sterling must comply with certain requirements as specified in Paragraph 55.

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