

SEP 20 1985

Rule Authorized Compliance Review

Bucher Producing Company

Mr. Joseph J. Bucher, President
 Bucher Producing Corporation
 109 Pleasant Street
 Bolivar, New York 14715

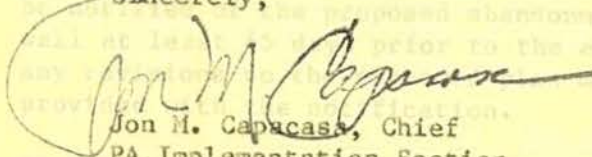
RE: PAS2R915APOT (Pearsall Lease) ✓
 PAS2R914AMCK (Kings Run Lease)

Dear Mr. Bucher:

Your June 27, 1985 submittal for 109 Rule Authorized Class IIR injection wells located in Potter and McKean Counties of Pennsylvania have been reviewed for completeness by the Region III Underground Injection (UIC) program staff. I am transmitting a notice which details the results of our review (deficient and/or approved documentation). I urge you to correct the deficiencies cited as soon as possible but not later than October 4, 1985.

Please do not hesitate to contact either Gary Naumick at (215) 597-2537 or Mary Anne Daly at (215) 597-8992 if you should have any questions on these issues.

Sincerely,



Jon M. Capacasa, Chief
 PA Implementation Section
 Water Supply Branch (3WM43)

Enclosure

CONCURRENCES

SYMBOL	MUM43				
SURNAME	M. Daly				
DATE	9/20/85				

Rule Authorized Compliance Review

for

Financial Responsibility Assurance 40CFR 144.28 (d) Bucher Producing Company

Your demonstration of financial responsibility is tentatively approved pending your submittal

Inventory 40 CFR 144.26(d)

Our records have been updated to reflect the current status of your wells. Since it is important to maintain an accurate number of inventory to manage the compliance producing activities of the UIC program, you are requested to notify this office when its associated changes occur. Conversion of a production well to an injection well is considered information of a new well, and a permit is required. sufficient authority in the company or a

Facility resulting in Injection Wells

	TOT	AC	TA	PA	AN
Kings Run Lease	98	34	64		
Pearsall Lease	11	11			
	109	45	64		

Plugging and Abandonment Plan 40CFR 144.28 (c)

Submittal approved. However, it is requested that you provide us with the class of cement that you intend to use when plugging the injection wells at your Kings Run and Pearsall Facilities. You are reminded that EPA must be notified of the proposed abandonment of a well at least 45 days prior to the event and any revisions to the approved plan must be provided with the notification.

Fracture Pressure Data 40 CFR 144.22(b) and 147.1954.

d. Letter of Credit (LOC): The effective In a Federal Register issued 8/26/85 included (Vol. 50, No. 165), the Regional Administrator of the UIC program in Region III proposed fracture gradients and a maximum injection pressure formula for rule authorized fields in the Commonwealth of Pennsylvania. A copy of this proposal was forwarded to you under separate cover to provide an opportunity for comment. A public hearing to discuss this proposal has been tentatively scheduled for September 26, 1985 at the University of Pittsburgh. For further information contact S. Stephen Platt at (215) 597-2783.

CONCURRENCES

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Financial Responsibility
Assurance 40CFR 144.28 (d)

Your demonstration of financial responsibility is tentatively approved pending your submittal of the following:

- a. Number of Production Fields and Number of Injection Wells: A list of producing fields or leases and their location in the state, number of production wells associated with injection well operations, and number of injection wells. This information must be certified by a person of sufficient authority in the company or a consulting engineer.
- b. Remaining Economic Life of a Field: Provide a certification by a registered professional geologist that the remaining economic life of at least one field exceeds five years. This statement should be co-signed by the Manager of Field Operation or a person with similar authority.
- c. Statement of Years in Business: A statement of the company's original date of operation and number of years in business certified by a person of sufficient authority in the company.
- d. Letter of Credit (LOC): The effective and expiration dates must be included in the document in order for the LOC to be valid. Also, any financial responsibility demonstration made with a LOC does require the establishment of a standby trust, usually done with the same financial institution. The standard language for a LOC (with effective and expiration date provisions) and a standby trust agreement are enclosed. To obtain final approval of the financial instrument you have selected, you must submit documentation based on the enclosed models.

Monitoring, Reporting
and Record Retention
40CFR 144.28(b), (g)-(i)

Mr. Joseph J. Bucher, President
Mensch Production Corporation
129 Pleasant Street
Solihair, New York 14715

Mr. William J. Zivot (Pearball) L
Mr. David J. Kline (Kline) L

Dear Mr. Bucher:

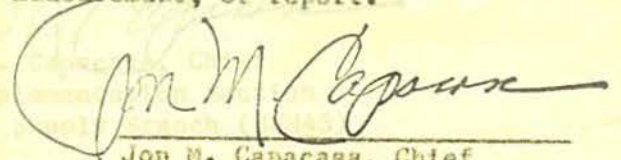
Your June 27, 1985 submit
injection wells located in Pa
have been reviewed for compliance
information (MIG) program staff.
Details the results of our review
attached. Please you to correct
as possible but not later than

Please do not hesitate to
(215) 597-7537 or Mary Ann de
have any questions or lower issues.

You are reminded that you should be currently conducting monthly monitoring of your injection wells in order to comply with the annual reporting requirement. An annual report must be submitted to EPA by January 31 of each year summarizing all required monitoring during the previous year. Your first report will cover the 18 month period from June 24, 1984 to December 31, 1985. The report should be submitted on EPA Form 7520-11 and must include the results of your monthly monitoring of the injection pressure, flow rate and cumulative volume on an individual well basis. You are also required to provide an analysis of the injection fluid that is representative of its characteristics. This analysis must be repeated and submitted to EPA thereafter when changes are made to the fluid.

A report of any noncompliance incident that may endanger health or the environment must be provided by telephone (215)/597-2537) within 24 hours from the time the operator becomes aware of the circumstances. A written submission must also be provided to EPA within five days of the verbal notification.

Records of all monitoring information on Class II wells must be retained for a period of at least three years from the date of the sample, measurement, or report.



Jon M. Capacasa, Chief
PA Implementation Section
Water Supply Branch (3W443)

CONCURRENCES

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