

CASE NO. 01-3072

UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

SYD H. LEVINE

Petitioner

v.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Respondent

PETITION FOR REVIEW OF AN ORDER OF THE
ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL APPEALS BOARD

JOINT APPENDIX

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¹ An earlier version of this webpage should appear in the Administrative Record, but is not shown in the index thereto.

² These two letters should appear in the Administrative Record, but neither is shown in the index thereto.

³ These two Affidavits are offered by way of rebuttal with respect to Respondent’s position that annulus gel was never approved in Region IV, and that a closed annulus is required for rule authorized Class IIR injection wells. Said two Affidavits bear original signatures in the five sets of the Joint Appendix sent to the Court.

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GLOSSARY

Annulus (Annular Space)	The space between two strings of tubulars, as in the space between tubing and casing
Annulus Gel	Water based bentonite clay gel used as an annular fluid
AOC	Administrative Order on Consent
AOR	Area of Review
Apx.	Joint Appendix
Aquifer	Geological formation capable of yielding a significant amount of water to a well or spring (40 C.F.R. §§144.3 AND 146.3)
A.R.	Administrative Record
Brine	Salt Water
Casing	Steel pipe, often 4-1/2 or 5-1/2 inch outside diameter, usually cemented into the drilled wellbore
Class IIR	Enhanced oil recovery injection well
EAB	U.S. EPA Environmental Appeals Board
DOJ	Department of Justice
EPA	United States Environmental Protection Agency
EPA Region IV	EPA Regional Office in Atlanta Georgia (covering Kentucky)
FOIA	Freedom of Information Act
gpm	Gallons per minute

MAP	Monitoring of Annulus Pressure MIT (described at 40 C.F.R. §146.8(b)(1))
MIT	Mechanical Integrity Test (see 40 C.F.R. §146.8)
Packer	Downhole sealing device
psi (psig)	pounds per square inch (gauge)
PWS	Public Water System
Reg-Fix	1993 Technical changes to the UIC regulations
SAPT	Standard Annular Pressure Test (the MIT described at 40 C.F.R. §146.8(b)(2))
SDWA	Safe Drinking Water Act
Tubing	Small diameter pipe sometimes run into casing and set near the top of the injection interval.
UIC	Underground Injection Control
USDW	Underground Source of Drinking Water

CERTIFICATION

All documents reproduced in the foregoing Joint Appendix are true and accurate copies of documents properly made a part of the record. Some of the photostatic reproductions herein have been made from originals or better copies than may appear in the Administrative Record.

Syd H. Levine

CERTIFICATE OF SERVICE

I hereby certify that on August 20, 2001, a copy of the foregoing was served by first class mail, postage paid, on the following counsel of record:

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