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April 15, 1998

Mr. Steve McCleery - ADA
Travis County District Attorney's Office
Attn: Public Integrity Unit
P. O. Box 1748
Austin, Texas 78701

Re: Additional Documents concerning TRRC
injection well program problems/Investigation Request

Dear Mr. McCleery:

Enclosed with this letter are two items related to the injection well programs problems of my April 2, 1998 letter and its associated package of documents. The two items of this letter and their description are below.

- 1) **March 30, 1998 letter to Larry Wright, P.E. of the EPA:** This letter (not a report) describes some opinions concerning TRRC injection well program problems related to lack of regulatory control and the possible injection operations above formation parting pressure. It is my understanding that Texas has regulations making it illegal to have injection operations above the formation fracture pressure. I do not know any other specific details concerning this regulation. I have been told this Texas law exists by the EPA.
- 2) **Booklet describing Map Editing/Billing Dispute Issues:** This booklet contains a description of the maps used and developed in the 1/4 Mile Area of Review study for the •••••••• Well No. 6 injection application. This booklet is being given to your office to give you a visual picture of the improperly plugged well problem discussed in the "dunning" letter. The maps indicate there is a big problem with map accuracy at the Texas Railroad Commission. The 6/27/95 map illustrates suspected or known improperly plugged wells before my consulting services were terminated by the injection applicant. Subsequent work revealed more improperly plugged well problems (map on page 13 of letter to Hathaway). These improperly plugged well issues relate to fulfilling the requirements of Statewide Rule 46 and the applicant's possible violation of Texas Natural Resources Code, Sec. 91.143.

Please keep these documents confidential (especially the "dunning" letter and enclosed booklet). Return them if they are of no use. If they are of no use, call me and I will come by to retrieve the documents. I am still trying to recover payment for services related to the "dunning" letter. I do not want further problems by having these documents reach the hands of people intent on harming me or my business.

The EPA has told me that any changes by them to existing Federal Regulations concerning the EPA Class II injection well program problems will probably have to be lawsuit driven. The political climate does not support more regulations and restrictions. The EPA is aware that their regulations are scientifically incorrect because they allow the universal use of the infinite acting pressure transient equation to justify injection projects. However, I don't believe they will admit it is a problem and that it is scientifically incorrect. Because of the EPA reluctance to correct this problem, one alternative is to get the county governments of areas having drinking water affected by such injection projects to help or add political weight to any possible investigation. This letter is written under the assumption that these issues will be investigated by your office.

I would greatly appreciate your office giving me recommendations of other authorities that can settled the issues of this letter and the April 2, 1998 letter if the Public Integrity Unit of the Travis County District Attorney's Office does not see a need to pursue these matters.

Please contact me by telephone at (512) 261-3476 if you have any questions concerning this letter and the enclosed documents. I would greatly appreciate any free advice you can offer concerning these issues.

Yours truly,

ORIGINAL SIGNED by David Voorhis

David B. Voorhis, Ph.D., P.E.
Owner