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UIC/Safe Drinking Water Act Enforcement: U.S. Environmental Protection Agency and Class II Well Owner/Operator Enter into Consent Agreement

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The United States Environmental Protection Agency ("EPA") and Robinson Engineering & Oil Company, Inc. ("Robinson") entered into a December 6th Consent Agreement and Final Order ("CAFO") addressing alleged violations of the Safe Drinking Water Act ("SDWA") Underground Injection Control ("UIC") regulations. See Docket No. SDWA-04-2016-1008(b).

The Consent Agreement provides that Robinson is the owner and/or operator of certain Class II UIC wells located in various counties in the State of Kentucky.

The UIC wells are stated to be permitted in accordance with 40 C.F.R. § 144.31 and the requirements of 42 U.S.C. § 300f of the SDWA.

The Consent Agreement identifies alleged violations that include:

- Failure to timely demonstrate the mechanical integrity of the rule-authorized "Subject Wells."
- Failure to close, plug and abandon an inactive Subject Well
- Failure to submit in a timely manner injection fluid analyses to EPA
- Exceedance of maximum injection pressure limitation of 450 psig as established by the Completion Report: contained in Robinson's file for the Subject Well

Robinson is stated to have participated in a show cause hearing with representatives of EPA to discuss the alleged violations.

Robinson agrees to a civil penalty of \$12,960.

[A copy of the Consent Agreement and Final Order can be downloaded here.](#)