



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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September 6, 2019

David M. Lee, P.E.
Director—Water Quality
WEC Energy Group
Peoples Gas
200 East Randolph Street
Chicago, Illinois 60601

Re: Groundwater Management Zone Application for Manlove Field
People v. People’s Gas Light and Coke Co.,
Champaign County, 17-CH-218

Dear Mr. Lee:

I am writing in response to the Groundwater Management Zone (“GMZ”) Application submitted for the Manlove Natural Gas Storage Field (“Manlove Field”) on August 1, 2019 and supplemented on August 28, 2019. This GMZ Application and supplement were submitted pursuant to the First Amended Agreed Interim Order for Immediate and Preliminary Injunction (“Order”), which has been agreed to by the parties but not yet entered in court. Based on these submissions, Illinois Environmental Protection Agency (“Illinois EPA”) is requesting additional information to complete our review of the GMZ Application.

In order to properly assess the GSI/PGL information, Illinois EPA is requesting separate high-resolution graphics for the maps, 3-D visualization models, and cross section maps. These high-resolution graphics must include the lines of cross sections and the locations of the three existing recovery wells. For the cross sections, it would be useful to include and properly label the private wells that have been sampled. These additional models and cross sections may indicate a need to add additional recovery wells.

Furthermore, there is not adequate analysis of the current proposed remedy of utilizing the existing three recovery wells and passive removal at the potable wells. The Order requires that the GMZ Application includes a “detailed description of all possible remedies considered, the actual remedy selected by Defendant and reasons why that remedy was selected over the others considered.” (Order, Section V.A, paragraph 41.h.ii). The GMZ Application does not adequately provide that analysis. Additionally, the GMZ Application lacks the required discussion and predictive modeling to show when remedial objectives will be achieved as required by the Order. (Order, Section V.A, paragraph 41.h.iii and iv).

IEPA-DIVISION OF RECORDS MANAGEMENT

RELEASABLE

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FEBRUARY 15, 2022

REVIEWER

PLEASE PRINT ON RECYCLED PAPER

MED

Exhibit 2

This requested information is necessary for Illinois EPA to complete our review and provide eventual approval of the GMZ Application. Please note that pursuant to the Order, you have 21 days to respond to this request. (Order, Section V.A, paragraph 42). Please contact me with any further questions or if you need additional information.

Sincerely,

Richard P. Cobb

Richard P. Cobb, P.G.
Acting Manager, Division of Public Water Supplies
Bureau of Water

Cc: Andrew Armstrong, Brian Navarrete, and Natalie Long, Illinois Attorney General's Office
Deborah Bone and Edward Casmere, Riley Safer Holmes & Cancila LLP
Gavin McCarty, WEC Energy Group – Business Services
Chuck Gunnarson and Amanda Kimmel, Illinois EPA