



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/782-1020

September 25, 2020

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

Re: IEPA Response to People’s Gas Light and Coke Company Groundwater Monitoring Zone (GMZ) Application for Manlove Natural Gas Storage Field and Response to IEPA Comments on the GMZ Application for Manlove Gas Storage Field, People v. People’s Gas Light and Coke Company, Champaign County, Case No. 17-CH-218

Dear Mr. Lee,

Illinois Environmental Protection Agency (Illinois EPA) Groundwater Section has reviewed the information provided in the August 1, 2019 People’s Gas Light and Coke Company (PGL) Groundwater Monitoring Zone (GMZ) Application for Manlove Natural Gas Storage Field and the May 20, 2020 Response to IEPA Comments on the GMZ Application for Manlove Gas Storage Field.

The GMZ application was filed with the Agency on August 1, 2019. The GMZ application provided details on the following:

- Defined boundaries for the GMZ including horizontal and vertical.
- Defined Remedial Criteria as Class I Potable Resource Groundwater Standards.
- Summarized Remedial Actions completed:
  - Source Control measures including rehabilitation of MC2 and evaluation and maintenance of other wells at the site.
  - Monitoring and residential control measures including passive vent installation, bottled water, gas-water separators, and methane detectors.
  - Aquifer remediation including installing 3 gas relief wells in Mahomet Aquifer and shallow sands (have not been activated due to regulatory issues).
  - Additional remediation measures were proposed for the GMZ including using MC2 for venting, additional passive vents, methane detectors, additional gas-water separators, and notifications to local well drillers/IDPH coordination for well drilling.
- Remedial action to continue until remediation objectives are met:
  - Monitoring and residential control measures
  - Use of gas relief wells
  - Continued use of additional remediation measures

IEPA-DIVISION OF RECORDS MANAGEMENT

FEBRUARY 15, 2022

RELEASABLE

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MED

The GMZ application did not provide remedial action alternatives. Illinois EPA provided comments on September 6, 2019 which included a request for high resolution figures and maps and an assessment of remedial alternatives.

After involvement with the Attorney General's Office to implement Section 31. PGL provided a response to comments on May 20, 2020 which included seven proposed actions to be performed to complete the GMZ application as follows:

1. Installation of relief wells in the four stratigraphic trap areas identified in the 3-D visualization and cross sections.
2. Securing of permits for existing relief wells.
3. More extensive monitoring and reporting on the new and existing monitoring wells.
4. Data collection from the new and existing monitoring wells.
5. Dedicated groundwater monitoring well network for the four stratigraphic trap areas.
6. Extensive sampling of the groundwater monitoring network with a minimum of eight samples per well, per month, for a year with quarterly sampling after one year.
7. Fate and transport model created from data collected.

The Groundwater Section conditionally approves the proposed GMZ with the following stipulations:

1. IEPA must approve specific locations of each well prior to installation of the well.
2. IEPA must approve the calculations of statistical analysis prior to the finalization of any reporting activities.

Please direct questions for clarification to Ms. Lauren Martin at 217 782 1020.

Sincerely,

Richard P. Cobb

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Cobb  
Date: 2020.09.25 07:54:30  
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Richard P. Cobb, P.G.  
Deputy Division 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  
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