

Statement to Michigan Senate
Energy and Technology Committee

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On behalf of Summerfield Township
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Ladies and gentlemen, my name is Frederick Lucas and I am here representing Summerfield Township, a farming community located in western Monroe County.

I'd like to begin by thanking the chairman and members for the opportunity to address this Committee regarding Senate Bill 387.

As the attorney for Summerfield Township, I first became aware of the term "Karst formation" when an energy company proposed locating an injection well in my Township. In all candor, prior to that time, I had never heard the word "Karst" before and I had no idea what it meant, but the more I learned about this unique geological formation the more concerned I became about the location of an injection well in my Township.

While I will leave it to the experts to provide a technical discussion of the characteristics of Karst, it is my understanding that Karst formations are porous layers of soluble rocks, such as limestone, that are highly susceptible to fracturing under pressure. Another key feature of Karst areas is that water, and any pollutants in the water, can migrate very quickly to areas far beyond the point of entry.

No human endeavor is without risk, and the same is true when it comes to the risk of contamination from injection wells. No matter how many safeguards we adopt, reports we prepare or precautions we take, the risk of contamination can never be reduced to zero. Having said this I concede that our economy would ground to a standstill, if we insisted that all activities have zero risk of harm. Consequently, like with most matters, it is necessary to perform a risk versus benefit analysis in determining whether it is wise to permit the introduction of pollutants via an injection well into a given area.

When an injection well is sited in an area where the risk of substrata fracture is low, the risk may be deemed to be acceptable. However, when the well is being located in an area known to have a high risk of fracture, even the slightest risk is unacceptable when weighed against the dire economic and environmental consequences that groundwater contamination would have on the community.

Summerfield Township, like much of Monroe County, is not served by a public water system. The predominant industry in the Township is agriculture and the local farming economy, like its residents, is dependent on individual domestic wells to serve their water needs. Anything that could adversely impact that water source would be nothing less than an economic disaster that would bankrupt the community.

Should the safeguards put in place to prevent pollutants from entering the ground water fail, given the Karst geology in this region, the migration of pollutants would be a near certainty rendering those domestic wells used for irrigation and human consumption unusable. It is for this reason that the Township believes that any activity that has even the slightest chance of polluting the water supply should be prohibited.

This risk becomes even more unacceptable when one considers the fact that Summerfield Township has no alternative water sources to serve its residents or to irrigate the fields, should the groundwater be contaminated. The cost to import water from other sources would be prohibitive and the residents would be facing an economic disaster from which they would have little chance of recovering.

Let me be clear, I am not here to argue against injection wells in all areas, I am only arguing that injection wells should not be permitted in areas where Karst formations exist or where they are in close proximity to the well. Simply stated, the risk of contamination in such areas, no matter how small, poses an unreasonable and unnecessary risk to the community and its residents.

I want to again thank this Committee for giving me this opportunity to address this issue and I trust that you will keep in mind the people of Summerfield Township as you deliberate this bill.