

*E. Spaulding Clark, Supervisor
Nancy C. Hedberg, Clerk
Donna E. Palmer, Treasurer*

Township of Scio

*Trustees: Richard A. DeLong
Christine A. Green
M. Jack Knowles
David S. Read*

May 30, 2014

Joseph J. Victory
Geologist, Permits and Bonding Unit
Office of Oil, Gas and Minerals
Michigan Department of Environmental Quality
525 West Allegan
Lansing, MI 48909

Re: West Bay Application to drill oil/gas in Scio Township (A140053)

Dear Mr. Victory;

Attached with regard to the referenced application to drill for oil/gas in Scio Township, you will find the Scio Township Board's Resolution opposing such proposed drilling. The reasons are myriad, including amongst other reasons, the following threats relating to the location for the proposed drilling and its associated activities:

1. The close proximity of the proposed drilling location to the nearby Huron River, which provides municipal drinking water to the City of Ann Arbor and portions of Scio Township, and the potential dangers to this water supply that could flow from oil and gas activities and any spills;
2. The associated dangers to the Huron River from any spills, as the river further serves as a recreational amenity for an area-wide population, encompassing two Metropolitan Parks within Scio Township;
3. The proximity of the proposed site to nearby drains and creeks, all of which eventually flow to the Huron River and would serve as a conduit for any spills;
4. The proximity of the proposed drilling location and its likely negative impacts upon nearby residential uses and property values near to the proposed drilling location(s);
5. The presence in the immediate area of the proposed drilling location of high tension electrical lines and a major electrical substation;
6. The presence of a high pressure gas transmission pipeline within the immediate area;

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7. The local road system that would serve the proposed site is in part gravel as well as two-lane asphalt, and such road system has not been designed and built for heavy truck traffic, and is not in any condition to do so;
8. The myriad activities associated with drilling for oil and gas, as well as the potential for spills and/or the release of hazardous substances, can and will have a negative effect on the quality of life of the Township's residents and associated property values;
9. It is noted that Scio Township is the center of the Gelman contamination, which has been the subject of both controversy and remediation efforts over the past 20 years. While such contamination may or may not be present in the proposed area of drilling (no investigations have been made in the locale), the Gelman contamination has demonstrated that 1,4 dioxane has entered multiple aquifers and continues to travel eastward underground, presumably toward the Huron River. Were there to be an oil spill, there is the possibility, if not the likelihood, that the result of an oil spill would have the same unending dispersion and contamination experienced with the Gelman contamination; and
10. The proposed site is approximately 0.4 miles from the Fox Science Preserve; 0.9 miles from Little Folks Corner school; 1.2 miles from Daycroft Montessori School; 1.8 miles from the Christian Montessori School; 2.8 miles from Skyline HS; 3 miles from the Dexter Schools complex encompassing Mill Creek Elementary, Cornerstone Elementary, Wylie Elementary, Bates Elementary and Creekside Intermediate Schools; and 4 miles from Emerson school; and finally
11. The current lack of training/equipment of local fire departments to deal with any catastrophic events and/or spills that may occur as a result of activities occurring at the drilling site.

I would urge that the MDEQ review the permit request in its relationship to these concerns, and deny the drilling request. I would further urge our legislators to reconsider the language in the Zoning Enabling Act that precludes any local regulation of oil and gas drilling and operations. The impact of such activities on any given township can be catastrophic and overwhelming.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Spaulding Clark". The signature is fluid and cursive, with a long horizontal stroke at the end.

E. Spaulding Clark
Township Supervisor

cc: Governor Rick Snyder
State Senator Tom Casperson
State Senator Randy Richardville
State Senator Rebekah Warren
State Representative Gretchen Driskell
State Representative Jeff Irwin
State Representative David Rutledge
State Representative Adam Zemke
Don Wyant, MDEQ Director
Harold Fitch, MDEQ
Shaun Lehman, MDEQ
Larry Merrill, Michigan Townships Association
Laura Rubin, Huron River Watershed Council
Ann Arbor Mayor and City Council
Washtenaw County Board of Commissioners
Evan Pratt, Washtenaw County Water Resources Commissioner

**SCIO TOWNSHIP
BOARD OF TRUSTEES**

**RESOLUTION OPPOSING OIL EXPLORATION AND DRILLING IN SCIO
TOWNSHIP, MICHIGAN**

Whereas, oil and/or gas exploration and drilling is proposed in Scio Township within two miles from the Ann Arbor City limits and less than one mile from the Huron River under MDEQ permit application #A140053; and

Whereas, oil and/or gas exploration and drilling can produce significant air pollution, heavy truck traffic and the risk for the release of hazardous substances above and below ground which have the possibility of traveling into or impacting Scio Township and its sources of drinking water being both the ground water aquifer and the Huron River; and

Whereas, the citizens of Scio Township have a quality of life which is profoundly enhanced by its natural attributes such as the Huron River's recreational opportunities, the river's provision of drinking water to multiple municipalities, and its scenic character, all of which could be at risk from the said oil exploration and drilling; and

Whereas, the proposed drilling location is in an area of the Township planned for low density residential uses, including agricultural, open space, and land preservation uses; numerous residential uses exist in proximity to the proposed drilling location which have been gradually replacing agricultural uses in the Township; the area is served by gravel roads which are not capable of handling significant motor vehicle use; public water and sewer is not available to residential or any other uses this area and any negative impacts on groundwater flows would immediately affect residential users; this area has significant high tension power lines served by a proximate power substation, and a high pressure gas transmission line runs closely proximate to the proposed location; the nearby Wing Drain flows into Honey Creek and the Huron River; and the site includes an MDEQ designated wetland. All of the foregoing would be negatively impacted by oil and gas exploration and development, let alone should an environmental spill or other accident occur on the site; and

Whereas, the Constitution of the State of Michigan calls for "the protection of the air, water and other natural resources of the state from pollution, impairment and destruction"; and

Whereas, although representatives of West Bay Exploration have indicated they would be willing to include a prohibition on hydraulic fracturing in future leases, such a

provision may not have been included in all leases signed to date; and

Whereas, in October 2013 the Ann Arbor Environmental Commission passed a resolution calling for a statewide and national moratorium on horizontal hydraulic fracturing for natural gas; and

Whereas, the effects of the proposed oil and gas drilling upon the existing Gelman 1-4 Dioxane plume, a long standing and as yet un-remediated contamination of the ground water, are unknown and could further impact the dispersion of the plume; further, given the contamination of multiple aquifers resulting from the Gelman discharges, were there to occur contamination of the Township's water supplies within the aquifers and/or the Huron River from oil and gas drilling, there would remain no source of clean water for the many residents in the area; therefore it is

RESOLVED, that the Scio Township Board of Trustees expresses its opposition to permitting said oil exploration and drilling, and any future oil exploration and drilling in any residential or environmentally sensitive areas of the Township such as proposed; and

RESOLVED, that the Scio Township Board of Trustees requests that the Michigan Department of Environmental Quality require an environmental impact assessment, including impacts to surrounding natural resources, and public health, safety and welfare, prior to any final agency decision making on permit application #A140053; and

RESOLVED, that the Scio Township Board of Trustees expresses its support for a statewide and national moratorium on horizontal hydraulic fracturing for natural gas and oil until such time as it can be shown to be safe for the environment and a thorough regulatory framework is established to ensure safety and disclosure; and

RESOLVED, that the Scio Township Board of Trustees hereby requests that the State of Michigan strengthen the ability of local units of government to safeguard the public health, safety, and welfare by amending the Zoning Enabling Act to expand the power of townships and counties to regulate drilling, mining, and other extractive industries within their jurisdictions;

RESOLVED, The Scio Township Clerk shall distribute copies of this resolution to State Representatives Zemke, Irwin, Rutledge, and Driskell and State Senators Warren and Richardville; Michigan Department of Environmental Quality Director Dan Wyant; Director of Office of Oil, Gas, and Minerals Harold Fitch; and the Michigan Townships Association.

NOW, THEREFORE, UPON MOTION BY TRUSTEE GREEN, SUPPORT BY CLERK HEDBERG, IT WAS RESOLVED that the Scio Board of Trustees hereby adopts the

incorporated resolution and expresses its opposition to any oil exploration and drilling in Scio Township, Michigan

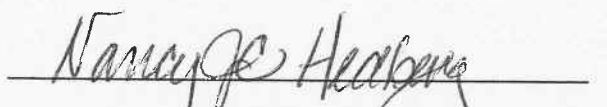
Roll Call:

Yes: Clark, Hedberg, Green, Read, Palmer and DeLong

No: none


Absent: Knowles

MOTION DECLARED ADOPTED this 27th day of May, 2014


Nancy J. C. Hedberg, Scio Township Clerk

CERTIFICATION

I hereby certify that the above is a true and correct copy of a Resolution adopted by the Township of Scio Board of Trustees at its Regular Meeting of 27th day of May, 2014.


Nancy J. C. Hedberg, Scio Township Clerk
5/27/2014