



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

April 2, 2020

Dear Oil and Gas Operator:

SUBJECT: Michigan High Water Vulnerability Planning and Assessment

You are likely aware Michigan is currently experiencing high Great Lakes and inland water levels that have recently caused significant erosion and property damage along coastal areas. These high water levels have been reported in the media and from the Michigan Department of Environment, Great Lakes, and Energy (EGLE) as primarily causing erosion, but infrastructure issues are also a concern. Groundwater elevations have also risen across the state. The increased groundwater levels, saturation, and high surface water levels increase the potential for flooding and impacts along waterways and within low lying areas. To prepare for the predicted increase in water levels in the near term, we are asking all permittees to complete a vulnerability analysis of your assets to minimize potential impacts. This letter is not meant to describe all items to review, but it offers some key items that may be appropriate to consider. Items to consider in potential flood prone areas include:

- Increased site inspection and equipment maintenance prioritization by your staff and contractors for areas prone to flooding or shallow ground water during this high water period and especially after large rain events.
- Evaluation of any action plans in place for well shut-in procedures, including, purging of vulnerable flowlines and draining of storage tanks, cellars, and secondary containment.
- Assessment of on-site safeguards and of emergency response measures for rapid deployment of personnel and equipment (spill kits, containment booms, etc.).

EGLE's expectation is that you complete this vulnerability analysis to identify wells, facilities, and infrastructures that may be at risk as soon as possible. Oil, Gas, and Minerals Division (OGMD) staff will be increasing inspections and closely monitoring at risk areas during this high water period. If you have any questions, please feel free to contact OGMD district office staff: or Mr. Mark Snow, Manager, Permitting and Technical Services Section, OGMD at 517-230-8233 or SnowM@Michigan.gov.

You may also find helpful information at EGLE's high water webpage: www.Michigan.gov/highwater

Sincerely,

Adam W. Wygant
Director and State Geologist
Oil, Gas, and Minerals Division
Department of Environment, Great Lakes, and Energy

cc: OGMD Supervisors