



Common Sense Initiative

Mike DeWine, Governor
Jon Husted, Lt. Governor

Carrie Kuruc, Director

Business Impact Analysis

Agency, Board, or Commission Name: Department of Natural Resources, Division of Oil and Gas Resources Management

Rule Contact Name and Contact Information:
Mark Bruce, mark.bruce@dnr.state.oh.us, 614-265-6920

Regulation/Package Title (a general description of the rules' substantive content):
Five Year Rule Review Filing for 1501:9

Rule Number(s): See Attachment 1

Date of Submission for CSI Review: August 13, 2020

Public Comment Period End Date: August 31, 2020

Rule Type/Number of Rules:

New/___ rules

No Change/_55_ rules (FYR? _Y_)

Amended/_4_ rules (FYR? Y)

Rescinded/___ rules (FYR? ___)

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

Reason for Submission

1. **R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.**

Which adverse impact(s) to businesses has the agency determined the rule(s) create?

The rule(s):

- a. ☒ **Requires a license, permit, or any other prior authorization to engage in or operate a line of business.**
- b. ☒ **Imposes a criminal penalty, a civil penalty, or another sanction, or creates a cause of action for failure to comply with its terms.**
- c. ☒ **Requires specific expenditures or the report of information as a condition of compliance.**
- d. ☐ **Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.**

Regulatory Intent

2. **Please briefly describe the draft regulation in plain language.**

Please include the key provisions of the regulation as well as any proposed amendments.

The Department of Natural Resources, Division of Oil and Gas Resources Management (Division) is undergoing a complete rewrite and reorganization of 1501:9 of the Administrative Code. Part of this effort involves identifying rules that do not need updating at this time and fulfilling the legal requirement to review all rules at least once every five years.

As part of that identification and review, the Division plans to file 55 rules as “no change.” The Division proposes to modify three rules (OAC 1501:9-1-01, 1501:9-1-02, and 1501:9-1-07) merely to reflect the correct online location of two documents that must be made available to the public and another rule (OAC 1501:9-12) to reflect current referenced industry standards.

All but two Chapters of 1501:9 are included in this filing. 1501:9-11 Well Plugging was updated, approved by JCARR, and has an effective date of August 10, 2020. Chapter 1501:9-8 is not due for a five-year rule review until 2021; however, it will be included as part of the reorganization and rewrite.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

The rules included in this filing regulate the permitting, bonding, spacing, and construction of oil and gas wells (1501:9-1); the permitting, approval, and construction of horizontal well pads (1501:9-2); the permitting, construction, inspection, monitoring, and operation of Class II Injection Wells, Enhanced Recovery Projects, and Solution Mining Projects (1501:9-3, 1501:9-5, and 1501:9-7); general safety regulations for regulated oil and gas activities (1501:9-9); and those pipelines that are regulated by the Division (1501:9-10). Chapter 1501:9-12 contains industry standards referenced in other rules. The Division proposes to update those references to their most current standards.

3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.

Authority: 1509.01, 1509.02, 1509.03, 1509.06, 1509.072, 1509.10, 1509.12, 1509.13, 1509.15, 1509.17, 1509.21 1509.22, 1509.221, 1509.23, 1509.24,

Amplifies:1509.01, 1509.02, 1509.021, 1509.022, 1509.03, 1509.04, 1509.05, 1509.06, 1509.061, 1509.062, 1509.07, 1509.072, 1509.074, 1509.08, 1509.09, 1509.10,1509.11, 1509.12, 1509.13,1509.14, 1509.15, 1509.17, 1509.18, 1509.181, 1509.19, 1509.20, 1509.21, 1509.22, 1509.221, 1509.23, 1509.24, 1509.25, 1509.28, 1509.32

4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?
If yes, please briefly explain the source and substance of the federal requirement.

The U.S. EPA delegated primary enforcement authority of certain types of underground injection control wells (Class II Disposal, Class II Enhanced Recovery and Class III Solution Mining) to Ohio in 1983 and the Agency has successfully regulated the program since that time. In brief, the U.S. EPA requires that Ohio's laws and rules be equal to or more stringent than federal code and implement the goals of the Safe Water Drinking Act, by protecting all Underground Sources of Drinking Water. Ohio's laws, rules, and program operation meet or exceed federal requirements.

5. If the regulation includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

Ohio's underground injection control laws, rules, and program operation address state-specific conditions and go into greater detail than federal counterparts. This allows for greater clarity and operational understanding for Ohio companies, and most importantly, adopts provisions that address specific geologic conditions unique to our state.

6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

The regulation of oil and gas activity in Ohio is in the public interest as it protects public health, safety, and the environment while also providing reasonable standards for the regulated industry to operate within. Ohio Revised Code 1509.02 grants the Division sole and exclusive authority to regulate the permitting, location, and spacing of oil and gas wells and production operations within the state. The statute states that the regulation of oil and gas activities is a matter of general statewide interest that requires uniform statewide regulation, and this chapter and rules adopted under it constitute a comprehensive plan with respect to all aspects of the locating, drilling, well stimulation, completing, and operating of oil and gas wells within this state, including site construction and restoration, permitting related to those activities, and the disposal of wastes from those wells.

7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

The primary measure of success is the continued protection of Ohioans' healthy, safety, and the environment. The rules included in this filing include standards regarding the issuances of permits, the regular submission of information, regular monitoring of wells/operations, inspections of regulated activities and the report of information. The Division monitors all of these areas for compliance, and takes corrective action when necessary. The Division strives to achieve compliance with applicable rule and law, before taking any punitive actions as Ohio law and rule is written to allow operators to develop oil and gas resources in a manner that will not negatively impact public health, safety, and the environment.

8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?

No

Development of the Regulation

9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

On July 7, 2020, the Division posted its intention to complete the five-year rule review as posted on the Division's website at <https://ohiodnr.gov/wps/portal/gov/odnr-core/divisions/division-e-oilgas/related-resource/rules-fyrr-public-comment>. The posting was shared via email with representatives of organizations representing oil and gas operators the same day. An email was distributed to the contacts contained in Attachment 2 the next day (July 8) sharing the link and notifying the recipient of the posting.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

No input was shared regarding this filing during the public comment period mentioned above.

11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

- 12.** The Division relied upon geologists and engineers, both from the government and the regulated community, when it originally drafted these rules. Division geologists agreed there was a scientific basis to update the standards contained in OAC 1501:9-12 and that is why the Division is recommending the rule be updated.

What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?

The Division reviewed multiple rules as part of its five-year rule review and determined that some of the rules could be pared back, replaced, or rescinded. Those rules will be submitted at a later date as part of our ongoing rule reorganization and rewrite. This package contains only those rules the Division determined required no or minor changes.

13. Did the Agency specifically consider a performance-based regulation? Please explain. *Performance-based regulations define the required outcome, but don't dictate the process the regulated stakeholders must use to achieve compliance.*

The Division strives to write performance-based regulations and considers many of these to be performance-based. As the Division continues our rewriting and reorganization of Administrative Code 1501:9, we are working to apply performance-based regulations, where applicable and appropriate.

14. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?

The Agency has sole and exclusive authority to regulate oil and gas activity (Revised Code 1509.02), so the activities regulated by these rules are not regulated by any other agency. As the Division continues our rewriting and reorganization of Administrative Code 1501:9, we will utilize the RegExplorer tool recently implemented by CSI Ohio to compare and review our proposed rules to ensure no unintended duplication exists.

15. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

The agency has communicated with the regulated community in the development of this rule and will continue outreach, including web postings and mailings to ensure the modifications made will be shared with regulated entities. Additionally, agency staff will be prepared to answer questions and field inspectors will be trained in the new requirements.

Adverse Impact to Business

16. Provide a summary of the estimated cost of compliance with the rule. Specifically, please do the following:

- a. Identify the scope of the impacted business community; and**
- b. Identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance,); and**
- c. Quantify the expected adverse impact from the regulation.**
The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a “representative business.” Please include the source for your information/estimated impact.

No changes (55 rules) to these rules (minor editorial changes to four) are proposed and therefore this rule will impose no additional cost of compliance upon any directly affected persons. The rules impact all entities regulated by the Division. The rules do not impose penalties or fines, however sections 1509.04, 1509.33, and 1509.99 define enforcement action the Division may take, and any applicable civil penalties or fines.

17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The regulation of oil and gas activity in Ohio is in the public interest as it protects public health, safety, and the environment while also providing reasonable standards for the regulated industry to operate within. As mentioned above, the regulation of oil and gas activities is a matter of general statewide interest that requires uniform statewide regulation, and this chapter and rules adopted under it constitute a comprehensive plan with respect to all aspects of the locating, drilling, well stimulation, completing, and operating of oil and gas wells within this state, including site construction and restoration, permitting related to those activities, and the disposal of wastes from those wells.

Regulatory Flexibility

18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

Protection of human health, safety, and the environment is the intent of the statute and rule, so any exemptions would not be applicable. The rules do provide opportunities for the Chief to make modifications based on well-specific conditions and situations.

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

ORC contains a process that ensures the Division make reasonable attempts to contact the person for outstanding paperwork violations. Through that process, a person has an opportunity to correct paperwork violations.

20. What resources are available to assist small businesses with compliance of the regulation?

Division staff are available to assist with compliance of the regulation for all businesses. Additionally, there are resources available on the Division's website that explain the rules.

Attachment 1

| | | |
|-------------|-----------|---|
| 1501:9-1-01 | Amend | Definitions |
| 1501:9-1-02 | Amend | Permitting |
| 1501:9-1-03 | No Change | Surety bond. |
| 1501:9-1-05 | No Change | Safety. |
| 1501:9-1-06 | No Change | Severability. |
| 1501:9-1-07 | Amend | Prevention of contamination and pollution |
| 1501:9-1-08 | No Change | Well construction. |
| 1501:9-2-01 | No Change | Definitions. |
| 1501:9-2-02 | No Change | Horizontal well site construction. |
| 1501:9-3-01 | No Change | Definitions. |
| 1501:9-3-02 | No Change | Exceptions. |
| 1501:9-3-04 | No Change | Prevention of contamination and pollution. |
| 1501:9-3-05 | No Change | Construction of and conversion to saltwater injection wells. |
| 1501:9-3-06 | No Change | Permit. |
| 1501:9-3-07 | No Change | Operating, monitoring and reporting of saltwater injection wells. |
| 1501:9-3-08 | No Change | Temporary storage of saltwater and oil field waste. |
| 1501:9-3-09 | No Change | Safety. |
| 1501:9-3-10 | No Change | Severability. |
| 1501:9-3-11 | No Change | Annular disposal. |
| 1501:9-3-12 | No Change | Injection approval required. |
| 1501:9-3-13 | No Change | Property rights unaffected. |
| 1501:9-5-01 | No Change | Definitions. |
| 1501:9-5-02 | No Change | Exceptions. |
| 1501:9-5-03 | No Change | Forms. |
| 1501:9-5-04 | No Change | Project approval required. |
| 1501:9-5-05 | No Change | Permit. |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | |
|-------------|-----------|--|
| 1501:9-5-06 | No Change | Prevention of contamination and pollution. |
| 1501:9-5-07 | No Change | Safety. |
| 1501:9-5-08 | No Change | Severability. |
| 1501:9-5-09 | No Change | Construction of and conversion to enhanced recovery input wells. |
| 1501:9-5-10 | No Change | Operation, monitoring and reporting of enhanced recovery projects. |
| 1501:9-5-11 | No Change | Property rights unaffected. |
| 1501:9-7-01 | No Change | Definitions. |
| 1501:9-7-02 | No Change | Applicability. |
| 1501:9-7-03 | No Change | Prohibition of unauthorized injection. |
| 1501:9-7-04 | No Change | Prevention of contamination and pollution. |
| 1501:9-7-05 | No Change | Authorization by rule. |
| 1501:9-7-06 | No Change | Identification of underground sources of drinking water and exempted aquifers. |
| 1501:9-7-07 | No Change | Permit. |
| 1501:9-7-08 | No Change | Construction of solution mining projects. |
| 1501:9-7-09 | No Change | Operation, monitoring, reporting, and recordkeeping of solution mining projects. |
| 1501:9-7-10 | No Change | Mechanical integrity. |
| 1501:9-7-11 | No Change | Plugging and abandonment. |
| 1501:9-7-12 | No Change | Safety. |
| 1501:9-7-13 | No Change | Severability. |
| 1501:9-7-14 | No Change | Property rights unaffected. |
| 1501:9-9-02 | No Change | General. |
| 1501:9-9-03 | No Change | Drilling and deepening operations. |
| 1501:9-9-04 | No Change | Workover, reconditioning, plugging back, completion, and plugging operations. |
| 1501:9-9-05 | No Change | Producing operations. |
| 1501:9-9-06 | No Change | Exceptions. |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | |
|--------------|-----------|---|
| 1501:9-9-07 | No Change | Severability. |
| 1501:9-10-01 | No Change | Definitions. |
| 1501:9-10-02 | No Change | General. |
| 1501:9-10-03 | No Change | Identification and location of pipelines. |
| 1501:9-10-04 | No Change | Strength of pipelines. |
| 1501:9-10-05 | No Change | Burial of pipelines. |
| 1501:9-10-06 | No Change | Exceptions. |
| 1501:9-12 | Amend | Industry Standards |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

Attachment 2 - Outreach Contacts

| Email | First Name | Last Name | Organization |
|----------------------------------|------------|------------|---|
| aadams@eclipseereg.com | Athena | Adams | Eclipse Compliance |
| acarmichael@penn-er.com | Allison | Carmichael | Penn E&R |
| acarmichael@wallacepancher.com | Allison | Carmichael | WallacePancher Group |
| adam.watchey@rettew.com | adam | watchey | rettew |
| adell.heeghan@pdce.com | Adell | Heneghan | PDC Energy |
| adell.heneghan@pdce.com | Aell | Heneghan | PDC Energy, Inc. |
| afernley@anteroresources.com | Amanda | Fernley | Antero Resources |
| agoddard@anteroresources.com | Aaron | Goddard | Antero Resources Corporation |
| akaras@fairshake-els.org | Andrew | Karas | Fair Shake Environmental Legal Services |
| albertsons2@frontier.com | Kathi | Albertson | Guernsey County Farm Bureau |
| alford@cesoinc.com | Brady | Alford | CESO |
| allyn.turner@steptoe-johnson.com | Allyn | Turner | Steptoe & Johnson, PLLC |
| amalie@oeffa.org | Amalie | Lipstreu | OEFFA |
| amberacampado@consolenergy.com | Amber Ray | Acampado | CNX Gas, LLC |
| amcavine@Langan.com | | | |
| amiller@tug-hillob.com | Amy | Miller | Tug Hill Operating, LLC |
| andrea.bourque@halliburton.com | | | |
| andrew.adgate@dnr.state.oh.us | Andrew | Adgate | ODNR |
| andy.kime@dnr.state.oh.us | | | |
| angie.haraka@cabotog.com | Angie | Haraka | |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|-----------------------------------|---------|-----------|---|
| asteel@anteroresources.com | Ashlie | Steele | Antero Resources |
| b.winslow@gaiconsultants.com | Brent | Winslow | |
| barthur@gulfportenergy.com | Blake | Arthur | Gulfport Energy |
| beth.kern@chk.com | Beth | Kern | Chesapeake Energy Corporation |
| bethany.mccorkle@dnr.state.oh.us | Bethany | McCorkle | ODNR |
| bgorbach@lawlion.com | Brooke | Gorbach | Tzangas Plakas Mannos |
| bhickman@ooga.org | Brian | Hickman | Ohio Oil & Gas Association |
| bill.chambers@steptoe-johnson.com | Bill | Chambers | Steptoe & Johnson |
| blake.roush@pdce.com | Blake | Roush | PDCE |
| blbrowne@earthlink.net | Barry | Browne | OFBF and NARO |
| bolszewski@gulfportenergy.com | Ben | Olszewski | 1977 |
| bpfefferle@mcdonaldhopkins.com | Ben | Pfefferle | McDonald Hopkins LLC |
| bpowell@triadhunter.com | Brent | Powell | Triad Hunter |
| bradenelson@yahoo.com | | | |
| brandon.mckinley@aep-lp.com | Brandon | McKinley | American Energy - Utica, LLC |
| brb@sgkpc.com | Brian | Boyer | Sherrard, German & Kelly, P.C. |
| bsmith@anteroresources.com | Bryan | Smith | Antero Resources |
| bvalli@cecinc.com | Bo | Valli | Civil & Environmental Consultants, Inc. |
| carnahan@envls.com | alicia | carnahan | elss |
| carrie@kmfad.com | | | |
| carrie@petroevaluation.com | Carrie | Buchanan | Petro Evaluation Services |
| cathy.bihlman@rettew.com | Cathy | Bihlman | RETTEW |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|--------------------------------------|-----------|---------------|----------------------------------|
| cbudzynski@slk-law.com | Cheri | Budzynski | Shumaker, Loop & Kendrick |
| cgallaugh@noblecountyohio.gov | Connie | Gallaugh | Noble County Engineer |
| chad.ulm@ineos.com | Chad | Ulm | |
| chriscollet@americanprojects.com | Chris | Collet | American Projects |
| christine.shepard-desai@pinoakep.com | Christine | Shepard-Desai | Pin Oak Energy Partners |
| christophertuttle@consolenergy.com | Chris | Tuttle | CONSOL Energy |
| colton.parsons@steptoe-johnson.com | Colton | Parsons | Steptoe & Johnson |
| connie.carden@cabotog.com | Connie | Carden | CABOT OIL & GAS CORPORATION |
| cowens@centralohiooil.com | Craig | Owens | Central Ohio Oil, Inc. |
| csheward@abresources.com | Christine | Shepard | AB Resources |
| cyrusblu24@yahoo.com | Cyrus | Blue | |
| dan@ernstseed.com | DAN | ARNETT | ERNST BIOMASS |
| dan@gmttitle.net | Daniel | Duris | Greater Metropolitan Title, Inc. |
| daniel.riel@williams.com | Dan | Riel | Williams Co. |
| dbockelmann@all-llc.com | David | Bockelmann | ALL Consulting |
| dcamero1@gmail.com | Dow | Cameron | DCO&G |
| dclark@petroxinc.com | Duane | Clark | Petrox, Inc. |
| dcoughlin@hess.com | Dawn | Coughlin | Hess Corporation |
| dmader@acecoho.org | Donald | Mader | ACEC Ohio |
| dmcallister@mcallisterent.com | david | mcallister | |
| dnorthrop@babstcalland.com | David | Northrop | Babst Calland Clements & Zomnir |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|-------------------------------------|-----------|-----------|---|
| Doctorparson@gmail.com | | | |
| doug.kitchen@hockinghillsenergy.com | Douglas | Kitchen | Hocking Hills Energy and well service LLC |
| dposey@bluetickinc.com | David | Posey | Bluetick, Inc. |
| dschranz@gulfportenergy.com | | | |
| dsshaheen@gmail.com | Diana | Shaheen | |
| dstuart@hullinc.com | Doug | Stuart | Hull & Associates, Inc. |
| dwoodohio@live.com | Donald | Wood | Donald E Wood, Esq. |
| dzuch@hullinc.com | Don | Zuch | Hull & Associates, Inc. |
| elizabeth.joyner@chevron.com | elizabeth | joyner | Chevron |
| eondrasik@hrlcomp.com | Eric | Ondrasik | HRL Compliance Solutions, Inc. |
| eric.heis@dnr.state.oh.us | Eric | Heis | ODNR |
| erik.fargo@riceenergy.com | | | |
| erik.mikkelson@hickspartners.com | Erik | Mikkelson | Hicks Partners |
| fischbach@cox.net | Don | Fischbach | |
| frm171818@windstream.net | Felicia | Mettler | Torch CAN DO |
| gaddington@envsi.com | Gretchen | Addington | Environmental Solutions & Innovations, Inc. |
| gaughanmark8@aol.com | Mark | Gaughan | Garcia357LLC |
| gdrussell@vorys.com | Greg | Russell | Vorys |
| george.hopley@ms.com | | | |
| gretchen.addington@hillstone-ep.com | Gretchen | Addington | HEP Shalewater Solutions, LLC |
| hevonen59@gmail.com | | | |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|---------------------------------|---------|--------------|---|
| ihajajr@langan.com | Imad | Hajjar | Langan |
| info@cflandowners.org | Dan | Coy | Clearfork Landowners Association |
| jackie.potvin@chk.com | Jackie | Potvin | |
| jairey@eclipseresources.com | Taylor | Airey | Eclipse Resources |
| janet.steele@dnr.state.oh.us | Janet | Steele | DNR Communications |
| jbible@p2energysolutions.com | Jessica | Bible | P2 Energy Solutions |
| jbullard@gulfportenergy.com | Jake | Bullard | Gulfport Energy |
| jdrozinski@rettew.com | Joseph | Drozinski | Rettew Associates, Inc. |
| jeffrey.glossa@pdce.com | Jeff | Glossa | PDC Energy |
| jenifer.hakkarinen@pdce.com | Jenifer | Hakkarinen | PDC Energy |
| jerry.nolder@hotmail.com | Jerry | Nolder | DCO&G |
| jessica.greathouse@chk.com | | | |
| jessica.harley@chk.com | Jessica | Harley | Chesapeake |
| jferenci@polestareng.com | Jack | Ferenci | Polestar Engineering |
| jjohnson@edgemarcenergy.com | Jaime | Johnson | Edgemarc Energy |
| jmarshall@gulfportenergy.com | Jace | Marshall | Gulfport Energy Corporation |
| jmcgreevy@cecinc.com | John | McGreevy | Civil & Environmental Consultants, Inc. |
| jnoon@rexenergycorp.com | Jim | Noon | Rex Energy |
| jody.c.jones@chk.com | Jody | Jones | |
| john.krattenmaker@pdce.com | John | Krattenmaker | PDC Energy |
| john.pickelhaupt@dom.com | John | Pickelhaupt | Dominion |
| jon.hickman@ascentresources.com | Jon | Hickman | Ascent Resources Utica |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|--|----------|-------------|-----------------------------|
| joseph.smith@pdce.com | Joe | Smith | PDCE Energy |
| joshjohnson@pennclearwater.com | Josh | Johnson | Clearwater Technologies LLC |
| jp.lawrence@riceenergy.com | John | Lawrence | Rice Energy |
| jranderson@kleinfelder.com | James | Anderson | Kleinfelder, Inc |
| jsamuel@capitolintegrity.com | Jim | Samuel | |
| jsilvis.fwap@yahoo.com | Jensen | Silvis | FWAP |
| jthomas@foenergyllc.com | JOHN | THOMAS | FO ENERGY LLC |
| juston.iburg@bhge.com | Juston | Iburg | BHGE |
| jwatkins@mwcd.org | John | Watkins | MWCD |
| jwillems@meritatc.com | Julie | Willems | Merit Advisors, LP |
| jwright@chevron.com | Jamie | Wright | Chevron |
| jzavatchan@eqt.com | | | |
| k.rose.beall@icloud.com | Kimberly | Beall | |
| k.shatto@yahoo.com | Kathy | Shatto | DCO&G |
| kandersen@all-llc.com | Kris | Andersen | ALL Consulting LLC |
| karen.winters@squirepb.com | Karen | Winters | Squire Patton Boggs |
| kathy.milenkovski@steptoe-johnson.com | kathy | milenkovski | steptoe & johnson |
| kbedilion@certifiedpressuretesting.com | Katrina | Bedilion | Certified Pressure Testing |
| kevin.caraker@heritage-enviro.com | Kevin | Caraker | Heritage Environmental |
| kevink@shalemtr.com | Kevin | Kosko | Shale Mountain Resources |
| koskokd@aol.com | Kevin | Kosko | K2 Environmental |
| ktrent@wm.com | Kathy | Trent | Waste Management |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|---|-------------|-------------|--|
| kyle.baldwin@ascentresources.com | Kyle | Baldwin | Ascent Resources-Utica |
| larry.drane@tetrattech.com | Larry | Drane | Tetra Tech, Inc. |
| lbarnard@anteroresources.com | Lisa | Barnard | Antero Resources |
| linkhartc@api.org | Claire | Linkhart | American Petroleum Institute |
| lkarosic@hrlcomp.com | Laura | Karosic | HRL Compliance Solutions, Inc. |
| lpatrickkelley@gmail.com | L. | Kelley | Attorney at Law |
| lzitkus@gulfportenergy.com | lester | zitkus | Gulfport Energy |
| m.tanner@gaiconsultants.com | Matt | Tanner | GAI Consultants |
| marc.willerth@magvar.com | Marc | Willerth | MagVAR |
| marilyn.yensick@gmail.com | Marilyn | Yensick | |
| mark.bruce@dnr.state.oh.us | Mark | Bruce | ODNR |
| mark@peavyenergy.com | Mark | Peavy | Peavy Energy Ventures LLC |
| markramser@hotmail.com | Mark | Ramser | Maram Energy, Inc. |
| matthew.pitts@mbakerintl.com | Matthe w | Pitts | Michael Baker International |
| mcarpenter@centralenvironmentalservi ces.com | Mark | Carpenter | Central Environmental Services, LLC |
| melissa_breitenbach@xtoenergy.com | Melissa | Breitenbach | XTO Energy |
| mfinnegan@progressivepcs.net | Megan | Finnegan | Progressive Consulting, Inc. |
| mfox@pointlogicenergy.com | Michael | Fox | Oil Price Information Service |
| mgamin@sbcglobal.net | Mark | Gamin | Attorney at Law |
| mgialousis@gulfportenergy.com | Mike | Gialousis | Gulfport Energy |
| mhammond@ooga.org | Matt | Hammond | Ohio Oil & Gas Association |
| mhouston@theoec.org | Melanie | Houston | Ohio Environmental Council |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|--------------------------------|--------------|-------------------|--------------------------------|
| mhuncik@cs.com | | | |
| michele.oliver@chk.com | Michele | Oliver | Chesapeake |
| millstb@aol.com | teresa | mills | citizen |
| mlayne@gwpc.org | Mark | Layne | GWPC |
| mlrecker@marathonpetroleum.com | Mark | Recker | Marathon Pipe Line LLC |
| mmiller@shumaker.com | Marcus | Miller | Shumaker, Loop & Kendrick, LLP |
| mobley@texas.net | Steve | Mobley | Buckeye Brine, LLC |
| mpitts@rettew.com | matthe w | pitts | Rettew |
| mrrxtech_yah@yahoo.com | Ron | Hale | Concerned Citizen |
| mstrini@hrlcomp.com | Marc | Strini | HRL Compliance Solutions, Inc. |
| mtfox@opsinet.com | Michael | Fox | Oil Price Information Service |
| mturman@nisource.com | Mauree n | Turman | NiSource |
| mvale@hammontree-engineers.com | Michael | Vale | Hammontree & Associates, Ltd. |
| mwarnock@bricker.com | | | |
| mwtaylor@vorys.com | Mac | Taylor | Vorys |
| myal@equinor.com | Michell e | Yalung | Equinor |
| natalie.beale@dnr.state.oh.us | | | |
| nathan.anderson@pdce.com | Nathan | Anderson | PDC Energy Inc. |
| nfela@rettew.com | Nathan | Fela | RETTEW Associates, Inc. |
| nholl@equinor.com | Nicole | Holloway | Equinor |
| nobleema@myfatlink.net | Chasity | Schmelzenb ach | Noble County EMA&HS |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|---------------------------------------|---------|-----------|----------------------------|
| nsaunders@edf.org | Nichole | Saunders | Environmental Defense Fund |
| nvaughan@kimblecompanies.com | Nathan | Vaughan | Kimble Company |
| ohiohale@gmail.com | Rocky | King | |
| ohioshale@gmail.com | Rocky | King | Hardrock Consulting |
| patrick.jorgensen@steptoe-johnson.com | Patrick | Jorgensen | Steptoe & Johnson |
| patrickhunkler@yahoo.com | patrick | hunkler | citizen |
| peggyhenderson1@gmail.com | Peggy | Freund | |
| penny@ooga.org | Penny | Seipel | OOGA |
| pgallagher@ctleng.com | Patrick | Gallagher | CTL Engineering |
| philkeevert@gmail.com | Phillip | Keevert | Monroe Co EMA |
| phillip.porter@pdce.com | Phillip | Porter | PDC Energy |
| randall.ferguson@pdce.com | RANDALL | FERGUSON | PDC Energy, Inc |
| raymondhoon@consolenergy.com | Raymond | Hoon | CNX Gas |
| rbarr1951@yahoo.com | Robert | Barr | Big Sky Energy Inc |
| rclutter362@aol.com | Rebecca | Clutter | NARO Appalachia |
| rdelliott@vorys.com | Ryan | Elliott | |
| rellman@spiritservices.com | Richard | Ellman | Spirit Services, Inc. |
| rhall@shalewater.com | Ryan | Hall | Shalewater Solutions |
| rhannan@larsondesigngroup.com | Richard | Hannan | Larson Design Group |
| rhuffmyer@mckimcreed.com | Russ | Huffmyer | McKim & Creed |
| riverpilot66@hotmail.com | | | NARO |
| rkjones@fs.fed.us | Richard | Jones | USDA Forest Service |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|------------------------------------|-----------|----------------|---|
| rob.pichardo@williams.com | Robert | Pichardo | Williams |
| robert.pollitt@steptoe-johnson.com | robert | pollitt | steptoe & johnson PLLC |
| rreda@oogeep.org | Rhonda | Reda | Ohio Oil and Gas Energy Education Program |
| rsahliattorney@columbus.rr.com | Richard | Sahli | R. Sahli Law Office |
| rvarner@ene.com | Roger | Varner | Ecology and Environment, Inc. |
| rvarner@keystoneconsultants.net | Roger | Varner | Keystone Consultants, LLC |
| rvarner@larsondesigngroup.com | Roger | Varner | Larson Design Group |
| ryan.channell@ncdenr.gov | Ryan | Channell | North Carolina Division of Energy, Mineral & Land Resources |
| ryan.dean@aep-lp.com | Ryan | Dean | American Energy Partners |
| ryoung@hrlcomp.com | Royce | Young | HRL Compliance |
| s.winters@vega.com | Scott | Winters | VEGA Americas |
| sarah.ghezzi@bwc.state.oh.us | sarah | ghezzi | division of safety & hygiene |
| sfisher@mdllp.net | Suzane | Fisher-Edwards | McMahon DeGulis |
| shafer@cesoinc.com | Seth | Shafer | CESO, Inc. |
| shamit@thrashereng.com | Steven | Hamit | The Thrasher Group, Inc. |
| shaun.casbarro@dnr.state.oh.us | | | |
| skilper@avalonholdings.com | Stephen | Kilper | AWMS Water Solutions, LLC |
| smcmurray@hilcorp.com | Stephanie | McMurray | Hilcorp Energy Company |
| smiracle@triadhunter.com | Sam | Miracle | Triad Hunter, LLC |
| sssoilandgas@gmail.com | Melissa | Lannom | SSS Oil and Gas, Inc |
| stephan.ault@chk.com | Stephan | Ault | Chesapeake Energy Corp. |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|--------------------------------|-----------|-----------|--|
| stephanie.airey@gmail.com | Stephanie | Airey | |
| stevenbuffone@consolenergy.com | Steven | Buffone | CONSOL Energy Inc. |
| stugend@keglerbrown.com | Steve | Tugend | Kegler Brown |
| susanbaldwin@halldrilling.com | Susan | Baldwin | Hall Drilling LLC |
| tdriscoll@fbtlaw.com | Thaddeus | Driscoll | Frost Brown Todd |
| tgt1955@gmail.com | Tom | Tugend | |
| tknobloch@jkpcinc.com | Timothy | Knobloch | James Knobloch Petroleum Consultants |
| tmills@chej.org | Teresa | Mills | Center for Health, Environment and Justice |
| tom_yarnick@xtoenergy.com | Tom | Yarnick | XTO Energy |
| tony.long@pdce.com | Tony | Long | PDC Energy |
| tony.vizurraga@pdce.com | Tony | Vizurraga | PDC Energy |
| tteevan@anteroresources.com | Teresa | Teevan | Antero Resources Corporation |
| ttucker003@woh.rr.com | Tina | Tucker | |
| vaneckh@dteenergy.com | Herman | Van Eck | DTE Energy |
| vanessapesec@gmail.com | Vanessa | Pesec | |
| veazeya@srcx.com | Amanda | Veazey | Seneca Resources |
| vgoo@statoil.com | Vicki | Goodenow | Statoil |
| wendy.booth@dnr.state.oh.us | Wendy | Booth | Division of Oil & Gas Resources Management |
| wwuroundr77@hotmail.com | Jody | Jones | |
| yi.201@osu.edu | Hongtao | Yi | The Ohio state university |

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov

| | | | |
|--------------------------|---------|---------|--------------|
| zfrymier@ohiochamber.com | Zachary | Frymier | Ohio Chamber |
|--------------------------|---------|---------|--------------|

77 SOUTH HIGH STREET | 30TH FLOOR | COLUMBUS, OHIO 43215-6117

CSIPublicComments@governor.ohio.gov