

Rule Summary and Fiscal Analysis

Part A - General Questions

Rule Number: 1501:9-3-11

Rule Type: Rescission

Rule Title/Tagline: Annular disposal.

Agency Name: Department of Natural Resources

Division: Division of Mineral Resources Management-Oil and Gas

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I. Rule Summary

1. Is this a five year rule review? Yes
 - A. What is the rule's five year review date? 10/28/2021
2. Is this rule the result of recent legislation? No
3. What statute is this rule being promulgated under? 119.03
4. What statute(s) grant rule writing authority? 1509.03, 1509.10, 1509.12, 1509.13, 1509.15, 1509.22, 1509.23
5. What statute(s) does the rule implement or amplify? 1509.01, 1509.02, 1509.03, 1509.10, 1509.12, 1509.13, 1509.15, 1509.22
6. What are the reasons for proposing the rule?

The Department of Natural Resources, Division of Oil and Gas Resources Management (Division) is undergoing a complete rewrite and reorganization of division 1501:9 of the Administrative Code. This chapter of rule (1501:9-3) governs Class II Disposal Wells and associated Surface Facilities and features a near total rewrite and reorganization of the current rule.

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, including Class II Disposal wells and surface facilities. The statute states that the regulation of oil and gas activities is a matter of general statewide interest that requires uniform statewide regulation. The Agency is striving to develop rules and regulation that provide clarity and certainty to the regulated community, while providing maximum protection for public health, safety, and the environment.

Specifically, the regulation of Class II Disposal Wells and Surface Facilities focuses on one of the most critical missions of the Division: the protection of groundwater. These rules are written to ensure maximum protections of underground sources of drinking water and surface water. Additionally, the enhancements presented in this rule are necessitated by changes since the rule was last updated including, but not limited to standard industry practices, the size and volume of Class II Disposal Wells and Surface Facilities now operating in Ohio, and a need to respond to specific situations that have occurred in Ohio.

7. Summarize the rule's content, and if this is an amended rule, also summarize the rule's changes.

The rule governs the siting, permitting, construction, operation, and reclamation of Class II Disposal Wells and Surface Facilities. The rule includes general provisions that ensure compliance with Ohio's primacy agreement with U.S. EPA and the protection of underground sources of drinking water as well as the prevention of contamination and pollution. One amendment to the rule is increased setback distances and additional siting criteria for Class II Disposal Wells and Surface Facilities, offering greater distances from the wells and facilities to nearby homes and other buildings not situated on the subject tract (i.e., those who are not involved in the project). Siting criteria for sensitive areas are also established, as is greater authority for the Chief of the Division to require enhanced measures that protect these areas. The rule includes more detailed reporting provisions, clarifies the Division's enforcement authority, and establishes the procedures an operator may take to resume operations after the enforcement actions are taken.

The rule enhances the permitting, construction, and operation requirements of Class II Disposal Wells and Surface Facilities. These enhancements are the result of: changes in standard industry practices; the size and volume of Class II Disposal Wells and Surface Facilities now operating in Ohio; and responses to specific situations that have occurred. Some of the enhancements include, but are not limited to:

- A greater area-of-review of penetrating wells around newly proposed Class II Disposal Wells and Surface Facilities;
- Clarified language regarding corrective action that must be taken for problematic wells identified in the area-of-review;

- Inclusion of the definition of a confining zone (the interval designated to protect USDWs), and standards for the review of a confining zone;
- Limitations or prohibition on disposal into certain formations;
- Increased cement to be placed during the construction or conversion of a Class II Disposal Well;
- Addition of site-specific reviews that may be required by the chief to address unique circumstances during construction of Class II Disposal Wells and Surface Facilities. Ohio law allows the Chief to attach terms and conditions to a permit; these revisions specify the terms and conditions that may be added on a site-specific basis and are a codification of current practices;
- A clarified and expanded public notice process that establishes time frames, standing and clear requirements for public notice, public meetings, and deficiencies in a permit application;
- Detailed review timelines for Division processing of a permit application;
- Detailed permitting, construction, and operational requirements for a Surface Facility. The current rule includes approximately two sentences that govern this critical component of the disposal process;
- Enhanced standards, requirements, and Division enforcement authority regarding seismic events near Class II Disposal Wells;
- New requirement for water wells within 1500 feet of new Class II Disposal wells and surface facilities to be baseline tested;
- Detailed process for modifying an application during and after construction of Class II Disposal Wells and Surface Facilities;
- Addition of requirements governing the issuance of an order that allows a Class II Disposal Well to begin injection, as specifically required pursuant to 1509.22 of the Ohio Revised Code;
- Enhanced testing of Class II Disposal Wells and Surface Facilities during construction, including a verification of operations before commencement of injection;
- Enhanced testing and inspections Class II Disposal Wells and Surface Facilities during operation, including regular testing, inspections, and pressure monitoring;
- Editing of rules governing annular disposal to prohibit the permitting a new annular disposal wells;
- Requirements for submission of a decommissioning plan before plugging and reclaiming Class II Disposal Wells and Surface Facilities.

The Division will rescind current rules governing Class II Disposal Wells and Surface Facilities and replace with new rules governing Class II Disposal Wells and Surface Facilities and Oil and Gas Waste Facilities. The new rules will include the same amount of regulatory restrictions as the rules being rescinded.

8. Does the rule incorporate material by reference? No

9. If the rule incorporates material by reference and the agency claims the material is exempt pursuant to R.C. 121.75, please explain the basis for the exemption and how an individual can find the referenced material.

Not Applicable

10. If revising or re-filing the rule, please indicate the changes made in the revised or re-filed version of the rule.

Not Applicable

II. Fiscal Analysis

11. Please estimate the increase / decrease in the agency's revenues or expenditures in the current biennium due to this rule.

This will have no impact on revenues or expenditures.

Not applicable.

Not applicable.

12. What are the estimated costs of compliance for all persons and/or organizations directly affected by the rule?

The rule does not include any additional fees nor fines and the estimated costs of compliance can be quantified in increased costs and employer time to comply with certain requirements of the rule.

As this rule is a near-total rewrite and reorganization of the current rule, it is difficult to identify all adverse impacts to the business community and to establish a specific cost for each one. However, through months of affected party and interested party discussions, a consensus was reached that the additional protections offered to public health, safety, and the environment outweigh the increased costs in time and money that might accompany achieving compliance with this rule.

Some of the estimated costs of compliance include:

- Increased setbacks, siting criteria, and volume limitations based on proposed formations reduce areas or injection zones that can be used for Class II Disposal Wells and Surface Facilities or require additional measures to be installed if sited in sensitive areas;
- Increased time to prepare information to be reviewed as part of a permit application;
- Increased distances for the area-of-review might result in more corrective actions that are required to be completed;

- Applicants will be required to provide notice of an application by either hand delivery or certified mail to owners/operators of wells within the area of review, property owners within 1,500 feet, and certain elected officials.
- Sampling of water wells within 1,500 feet of the proposed Class II Disposal Well will now be required. Sampling of an individual well can cost approximately \$1,200;
- Enhanced well construction/conversion standards will require additional costs in materials such as cement. These costs are estimated to be in hundreds of dollars; and
- Increased testing of Class II Disposal Wells and Surface Facilities.

13. **Does the rule increase local government costs? (If yes, you must complete an RSFA Part B). No**
14. **Does the rule regulate environmental protection? (If yes, you must complete an RSFA Part C). Yes**
15. **If the rule imposes a regulation fee, explain how the fee directly relates to your agency's cost in regulating the individual or business.**

Not applicable.

III. Common Sense Initiative (CSI) Questions

16. **Was this rule filed with the Common Sense Initiative Office? Yes**
17. **Does this rule have an adverse impact on business? Yes**
- A. **Does this rule require a license, permit, or any other prior authorization to engage in or operate a line of business? Yes**
- The rule requires a permit to construct and operate a Class II Disposal Well and/or surface facility.
- B. **Does this rule impose a criminal penalty, a civil penalty, or another sanction, or create a cause of action, for failure to comply with its terms? No**
- The rule does not impose a penalty, but Ohio Revised Code 1509.04 defines enforcement action the Division may take, such as compliance notices, compliance agreements, or administrative orders.
- C. **Does this rule require specific expenditures or the report of information as a condition of compliance? Yes**

The rule requires certain information to be required as part of a permit review and includes quarterly and annual reporting.

D. Is it likely that the rule will directly reduce the revenue or increase the expenses of the lines of business of which it will apply or applies? Yes

The adverse impact can be quantified in increased costs and employer time to comply with certain requirements of the rule. As this draft rule is a near-total rewrite and reorganization of the current rule, it is difficult to identify all adverse impacts to the business community and to establish a specific cost for each one. However, through months of affected party and interested party discussions, a consensus was reached that the additional protections offered to public health, safety, and the environment outweigh the increased costs in time and money that might accompany achieving compliance with this rule.

IV. Regulatory Restrictions (This section only applies to agencies indicated in R.C. 121.95 (A))

18. Are you adding a new or removing an existing regulatory restriction as defined in R.C. 121.95? No

A. How many new regulatory restrictions do you propose adding?

Not Applicable

B. How many existing regulatory restrictions do you propose removing?

Not Applicable

Rule Summary and Fiscal Analysis

Part C - Environmental Rule Questions

Pursuant to Am. Sub. H.B. 106 of the 121st General Assembly, prior to adopting a rule or an amendment to a rule dealing with environmental protection, or containing a component dealing with environmental protection, a state agency shall:

- (1) Consult with organizations that represent political subdivisions, environmental interests, business interests, and other persons affected by the proposed rule or amendment.
- (2) Consider documentation relevant to the need for, the environmental benefits or consequences of, other benefits of, and the technological feasibility of the proposed rule or rule amendment.
- (3) Specifically identify whether the proposed rule or rule amendment is being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal environmental law or to participate in a federal environmental program, whether the proposed rule or rule amendment is more stringent than its federal counterpart, and, if the proposed rule or rule amendment is more stringent, the rationale for not incorporating its federal counterpart.
- (4) Include with the proposed rule or rule amendment and rule summary and fiscal analysis required to be filed with the Joint Committee on Agency Rule Review information relevant to the previously listed requirements.

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- (A) Were organizations that represent political subdivisions, environmental interests, business interests, and other persons affected by the proposed rule or amendment consulted? Yes**

Please list each contact.

Contact list attached. The Division held numerous affected party meetings with members of the regulated community who would be directly impacted by these rules over the course of several months. These meetings were held in-person and virtually. On June 11, 2021 the rule was made available for interested party review via a posting on the Agency's website. Additionally, the notice of posting was emailed to the receipts on the attached list.

- (B) Was documentation that is relevant to the need for, the environmental benefits or consequences of, other benefits of, and the technological feasibility of the proposed rule or amendment considered? No**

Please indicate the reasons for not providing the information.

The Agency relied upon geologists, engineers, and environmental health and safety experts from the Agency and the regulated community, when drafting these rules.

- (C) Is the proposed rule or rule amendment being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal environmental law or to participate in a federal environmental program? Yes**

Is the proposed rule or rule amendment more stringent than its federal counterpart?
Yes

What is the rationale for not incorporating the federal counterpart?

The U.S. EPA delegated primacy of Class II Disposal Wells 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 protect all Underground Sources of Drinking Water. Ohio's laws, rules, and program operation meet or exceed federal requirements. The U.S. EPA has reviewed this draft rule, provided comments, and changes were made based on this feedback.

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. Additionally, delegated authority from the U.S. EPA only applies to the Class II Disposal Well; the regulation of surface facilities is a state-only regulation that is in the public interest to protect public health, safety, and the environment.

- (D) If this is a rule amendment that is being adopted under a state statute that establishes standards with which the amendment is to comply, is the proposed rule amendment more stringent than the rule that it is proposing to amend? No**

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