

## Rule Summary and Fiscal Analysis

### Part A - General Questions

**Rule Number:** 1501:9-4-05

**Rule Type:** New

**Rule Title/Tagline:** Construction, authorization to operate, and amendments to an oil and gas waste facility.

**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?** No
  - A. **What is the rule's five year review date?**
2. **Is this rule the result of recent legislation?** Yes
  - A. **If so, what is the bill number, General Assembly and Sponsor?** HB 59 - 130 - Amstutz
3. **What statute is this rule being promulgated under?** 119.03
4. **What statute(s) grant rule writing authority?** 1509.03, 1509.22
5. **What statute(s) does the rule implement or amplify?** 1509.01, 1509.02, 1509.03, 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 governs the storage, recycling, treatment, processing, and disposal of brine and other waste substances at Oil and Gas Waste Facilities.

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. The rule ensures compliance with 1509.22 (C) of the Revised Code, which directs the Chief to adopt rules regarding the storage, recycling, treatment, processing, and disposal of brine and other waste substances at Oil and Gas Waste Facilities. The Division has regulated these facilities through chief's orders, as permitted by law.

The Agency believes the draft rules provide clarity and certainty to the regulated community, while providing maximum protection for public health, safety, and the environment.

**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 Oil and Gas Waste Facilities. The rule includes general provisions that ensure the prevention of contamination and pollution, protection of underground sources of drinking water and surface water, and the appropriate handling of oil and gas waste. The rule includes, but is not limited to, the following provisions:

- Establishes general regulations oil and gas waste facilities must follow, including the requirement that facilities currently operating under a chief's order obtain a permit;
- Sets forth standards for proprietary and critical infrastructure information;
- Establishes insurance and financial assurance requirements;
- Establishes siting and setback criteria, including provisions allowing the chief to require additional requirements in sensitive areas;
- Outlines the permitting requirements for an Oil and Gas Waste Facility, including provision that plans must be completed by an engineer;
- Provides detailed review timelines for Division processing of a permit application;
- Includes a public notice process that establishes time frames, standing and clear requirements for public notice, public meetings, and deficiencies in a permit application;
- Institutes detailed permitting, construction, and operational requirements for an Oil and Gas Waste Facility, including standards for modifying a facility during and after construction;
- Sets forth the Division's enforcement authority;
- Sets forth requirements for testing of Oil and Gas Waste Facilities during construction, including a verification of how the facility was built to appropriate standards and specs before commencement of operation;
- Establishes testing and inspections of Oil and Gas Waste Facilities during operation, including regular testing and inspections;
- Includes reporting requirements; and

- Institutes requirements for decommissioning and reclaiming the site of a closed Oil and Gas Waste Facility.

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 number 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.

N/A

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.

This rule is the promulgation of procedures already being followed by operators as part of the process to obtain and maintain compliance with a Chief's Order to operate an Oil and Gas Waste Facility. It is difficult to identify all adverse impacts to the business community and to establish a specific cost for each one.

Some of the adverse impacts associated with this draft include:

- Setbacks and siting criteria limitations reduce areas where new Oil and Gas Waste Facilities can be constructed;
- Requirements to obtain insurance and financial assurance;
- Increased time to prepare information to be reviewed as part of a permit application;
- Applicants will be required to provide notice of an application by either hand delivery or certified mail to property owners and certain elected officials within 1,500 feet of the oil and gas waste facility; and
- Associated costs with the public notice process required for a new Oil and Gas Waste Facility.

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 an oil and gas waste 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 regular reporting of information.

- 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 25, 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 recipients on the attached list. The rule also advanced through the CSI public comment process.

- (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 Division relied upon professional engineers from the Agency and experts from 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? No

Is the proposed rule or rule amendment more stringent than its federal counterpart?  
*Not Applicable*

- (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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