



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Rescinded/___ rules (FYR?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.

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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.

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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)?

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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.

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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.

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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.

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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.

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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.

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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

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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-hillop.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@cobotog.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

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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

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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			

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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

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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

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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

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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

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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 Servcies, 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 Forestg Service

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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.

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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

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CSIPublicComments@governor.ohio.gov

zfrymier@ohiochamber.com	Zachary	Frymier	Ohio Chamber
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CSIPublicComments@governor.ohio.gov