



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

October 9, 2013

Mr. Jeff Harper  
Central Environmental Services, LLC  
2130 Harris Highway  
Washington, WV 26181

RE: K & H Partners, LLC Containment/Treatment Area

Dear Mr. Harper:

The Ohio Department of Natural Resources (ODNR), Division of Oil & Gas Resources Management staff (DOGRM) met with you and performed a site visit to the above referenced facility on September 27, 2013. This letter is in response to that visit.

The underground injection control facility was already permitted and in operation at the time of the visit. The controls and management of the operation appeared to be responsible and in accordance with state rules and regulations.

The purpose of the visit was to view the location for construction of a solidification area at the injection well unloading facility. This treatment area would allow the facility to manage solids that are not suited for disposal in the well by storing them in covered tanks and solidifying the materials in open half tanks. Once solidified, the materials would be transported for disposal at an appropriate landfill.

A plan sheet of the facility was provided to DOGRM for review and comment. Based on the site visit and the plan sheet, DOGRM is requesting the following:

- Details, including a cross-section, for the containment area for the four frac tanks;
- Specifications on the storage (frac) tanks, such as capacity, grounding, cover, etc.;
- Details on the piping/pumping controls for the storage tanks. Specific details on overfill protection;
- Details are requested on operational protocols, to include characterization of accepted materials, management of TENORM, and management and tracking of final disposition of the waste materials; and
- Provide a proposed schedule for construction and commencement of operation.

Beginning on or after January 1, 2014, a permit will be required for the operation of treatment facilities related to oil and gas industries, such as this solidification site, in accordance with Ohio Revised Code Section 1509.22 (as revised by House Bill 59). As the rules for permitting production operations have not yet been finalized, the division cannot provide specific construction and operational guidelines, but would encourage that design, construction, operation, and maintenance of the facility are well documented and is operated and maintained in a manner that ensures the safety and health of the public and environment.

Please feel free to contact me at 614/265-6905 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Beth A. Pratt". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Beth A. Pratt, P.E.  
Project Engineer

C: Jon Scott, Athens Co. Inspector, DOGRM