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Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Division of Oil and Gas Resources Management

Richard J. Simmers, Chief

2045 Morse Road, Bldg. F2

Columbus, OH 43229-6693

Phone: (614) 265-6922

Fax: (614) 265-6910

June 24, 2014

Mr. Jon M. Eltringham, Jr.
813 Westbourne Avenue
Zanesville, OH 43701

**RE: Applications to Operate a Facility
E & R Energy Services, LLC
Muskingum County**

Dear Mr. Eltringham:

The Division of Oil and Gas Resource Management (DOGRM) received the E & R Energy Services, LLC application to operate a facility on June 3, 2014. A temporary authorization, in the form of a Chief's order, is required to operate this facility. After review of the submittal, DOGRM has identified the following deficiencies and concerns pertaining to the application submittal. Please provide the information that is required in the attached guidelines for an application for a Chief's order and address the questions and concerns listed below.

Requirements for an application for a Chief's order:

- Provide an aerial photograph of the proposed site. A small location/vicinity map was provided, but an aerial view is requested to view the general area.
- Please clarify the process flow, specifically the flows in the waste schematic on sheet 3 of the provided drawings. The trench drains are routed into the frac tanks and also into the manhole, wet well, and filter pod. How is the flow split from the truck wash area trench drain between the manhole and the frac tanks? Where does the flow discharge to from the filter pod? How will spills be managed in the solidification area? Is the only treatment of the truck wash water and spills in the solidification area the filter pod?
- Provide calculations for the storage volumes, including operating and top of impoundment volumes, for both the fresh water and the dirty water ponds.
- Provide an estimate of the volume of materials that will be managed at the facility on a daily, monthly or annual basis.
- Provide a disclosure of the chemical reagents, available MSDS and a description of their function, to be used at this site. Please note the enclosed letter detailing approved agents for stabilization of materials for disposal in Ohio landfills.

Sawdust is not an acceptable agent for stabilization. Explain the purpose of the sawdust on site.

- Provide details on methods that will be used to document the volume and characterization of material received and the final disposition of material.
- Provide a solids management plan, including TENORM testing and worker exposure controls.

General Questions and Concerns

- Please clarify the plumbing of the frac tanks. The individual tanks should be isolated to prevent draining of all of the tanks in the event of failure of one tank or valve, or the secondary containment should be designed to store the collective volume of all the tanks. Spill containment should be installed for the truck to hydrant connection points. This is a probable location for spills to occur.
- Installation of secondary containment, with a leak detection zone, is highly recommended for the waste pond to ensure early detection of potential leaks in the liner system.
- No geotechnical analyses were performed for this site. DOGRM would recommend a geotechnical analysis be performed to ensure a stable access road, pond and site. At a minimum, the analysis should contain analysis of the proposed slopes, soils analysis for determining bearing capacities, optimum compaction and moisture content.
- Please provide any operational procedures to prevent overfilling of the pond through mechanical and surface water inflow and any design calculations/consideration for the sizing of the diversion channels redirecting the surface water from the dirty pond. Two feet of freeboard is recommended for both the clean and the dirty pond.
- A closure plan for the site was proposed in this submittal. DOGRM would recommend an initial assessment of the site conditions to ensure that closure conditions meet or exceed the preconstruction conditions. The installation of monitoring wells should also be considered.

Please submit the required items, provide clarification to the questions and give consideration to the recommendations listed in this letter. You may contact me at 614/265-6905 and/or by email at beth.pratt@dnr.state.oh.us with any questions.

Sincerely,



Beth A. Pratt, P.E.

DOGRM Engineer

C: Tim Linn, P.E., Linn Engineering, Inc.
Rocky King, Regional Supervisor, DOGRM
Blake Arthur, P.E., DOGRM Engineer