

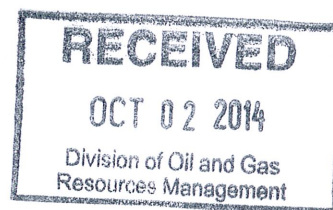


Civil & Environmental Consultants, Inc.

Celebrating 25 Years

October 1, 2014

Mr. Blake Arthur
Ohio Department of Natural Resources
Division of Oil and Gas Resources Management
2045 Morse Road
Columbus, OH 43229



Dear Mr. Arthur:

Subject: Notification of Phased Construction Sequence and Facility Modifications
ODNR Chief's Order No. #2014-183
WTL Processing Facility
Weavertown Transport Leasing, Inc.
50810 State Route 7
New Matamoras, OH 45767
CEC Project 112-048

On behalf of Weavertown Transport Leasing, Inc. (WTL), Civil & Environmental Consultants, Inc. (CEC) is pleased to submit this Notification of Phased Construction Sequence and Facility Modifications for the proposed WTL Processing Facility located at 50810 State Route 7, New Matamoras, Ohio 45767. The Application to Operate a Facility (Application) for the proposed WTL Processing Facility was approved by the Ohio Department of Natural Resources (ODNR), Order by the Chief (Order), Order No. 2014-183 dated June 20, 2014. Exploration and Production (E&P) waste solidification, TENORM down-blending and brine treatment for re-use are processes included in the Application.

As discussed with ODNR during a meeting on August 12, 2014, WTL will construct the processing facility in phases. Phase 1 construction will consist of site grading, staging areas and erosion and sedimentation control features on the north property. Phase 2 will include construction of a processing building, which will be a four side enclosed structure to be used for solidification of E&P waste, on the north property. Phase 3 will include site grading, staging areas and erosion and sedimentation control features at the contiguous south property and Phase 4 will include a the construction of a processing building on the south property. The proposed TENORM staging area design has been modified from a concrete containment structure to a recompacted clay and 40 mil HDPE geomembrane liner system. The proposed building has been modified from a pit-type solidification basin to a ramp-style containment structure. Construction of a brine treatment process contained in the original application will be added at a future date. Phased construction plans and facility modifications are depicted in the enclosed drawing package.

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WTL will adhere to the conditions of the Order including the following:

1. WTL shall conduct all operations in compliance with Ohio Revised Code (R.C.) 1509 and Ohio Administrative Code (OAC) 1501:9.
2. Brine shall not be disposed of in a manner not specified in R.C. 1509.22(C)(1)(a) through R.C. 1509.22(C)(1)(c). Disposal of brine pursuant to R.C. 1509.22(C)(1)(d) requires separate written approval of the Chief.
3. The Order shall terminate upon any of the following, whichever occurs first:
 - a. The Division issues a permit to WTL for the WTL Processing Facility pursuant to rules promulgated under R.C. 1509:22(C);
 - b. The Division denies a permit to WTL for the WTL Processing Facility pursuant to rules promulgated under R.C. 1509:22(C); or,
 - c. Six months after the effective date of rules adopted under R.C. 1509:22(C).

Additional details of the facility design, construction and operation will be included in the ODNR Application to Operate submittal which will be required in accordance with rules promulgated under ORC 1509.22(C).

Please contact me at the 614-545-1260 if you have any questions or require additional information regarding this submittal.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Roy A. Stanley, CPG
Project Manager



Duane Lanoue, P.E.
Principal

cc: Mr. Daryl Heiser, WTL

Enclosures