



DAVE YOST

OHIO ATTORNEY GENERAL

Environmental Enforcement-
ODNR Unit
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PAC DEVELOPMENT, LLC
c/o Justin L. Caldwell, Statutory Agent
1037 S. Lawnridge St.
Bolivar, Ohio 44612

September 4, 2020

Dear Well Owner:

I am writing to advise you that the Ohio Department of Natural Resources, Division of Oil & Gas Resources Management, has referred this matter to our office for enforcement proceedings pursuant to Ohio Revised Code Section 1509.33.

Our office is authorized to file an enforcement action in common pleas court to seek compliance with Chapter 1509 of the Ohio Revised Code, the rules issued thereunder, and the terms and conditions of orders or permits issued by the Chief of the Division of Oil & Gas Resources Management. In particular, this lawsuit would involve the filing of a complaint including, but not limited to, claims against PAC Development, LLC for failure to comply with: Chief's Orders 2013-150 and 2014-18, Ohio Revised Code Section 1509.03(D), and Ohio Admin.Code Sections 1501:9-3-07(G) and 1501:9-3-12(B). The relief sought may include an injunction to comply with the law, civil penalties as provided for under R.C. 1509.33, attorney fees, and costs.

In an effort to limit litigation expenses and other consequences associated with a contested enforcement action, we offer the opportunity to resolve this referral through an agreed-upon consent order. However, due to the need to immediately resolve these enforcement issues, it is imperative that if you desire to resolve this matter through a consent order, that you or your attorney contact my office no later than **October 4, 2020** to discuss the terms of a resolution. If I have not received correspondence regarding this matter by **October 4, 2020**, the State of Ohio will have no alternative but to proceed with litigation.

Sincerely,

DAVE YOST
Ohio Attorney General

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cc: file