**Questions for Ohio Department of Natural Resources**

**(Division of Oil & Gas Resources Management)**

**Public Meeting of June 2, 2022**

Thank you for holding this public meeting about the application from Arrowhead Road Services for a permit for a second Class II injection well in Belpre Township (Washington County).

1. In 2021 Washington County led the state with 5 million barrels of brine waste injected into its lands. Is there any limit that ODNR sees to how much brine waste, which contains toxic substances and radioactivity, is injected in Washington County? If so, what is that limit?
2. What is the next step in this permitting process after the public meeting?
3. Several people have asked for an extension of the public-comment period for this application. Will it be extended in light of the fact that ODNR sent out the announcement about the application 12 months after the application was submitted? Why did it take ODNR 12 months to send out the public notice of this application? ODNR gets 12 months to review this application—the public gets less than one month.
4. How many sustainable jobs does ODNR estimate that this new well will bring to the county? There may be a few trucking jobs associated with this new well, but even these jobs will be lost when barge hauling of brine waste begins.
5. Does any of the revenue that the State of Ohio receives from these disposals well companies come back to Washington County and to Appalachia Ohio, where most of the hydraulic fracturing and brine waste disposal take place?
6. Does ODNR have any different disposition to out-of-state companies seeking permits for Class II injection wells than to Ohio companies?
7. Who is the owner of this proposed well? When Arrowhead Road Service of Rosedale VA was called about questions regarding the well, we were referred to Mr. Cavallo. The application is signed by Mr. Shrader.
8. What is the plan for the trucking route of brine waste from production wells to the proposed injection well? Have the following officials been informed or consulted about the increase in trucking traffic if this application is approved: District 10 Office of ODoT, Washington County Engineer, Belpre Township trustees and other affected municipalities?
9. What plans does the applicant (or ODNR) have for the protection of production wells from damage or destruction of these production wells from the massive amounts of brine waste injected into the earth in this county? The application mentions that there is one producing well within 0.5 mile of the proposed injection well. The application refers to 5,000 bbl/day as an estimate of the brine waste injection. That amounts to almost 2 million bbl/year (actually the application does not state if this 5,000 figure is for barrels or gallons).
10. What protections have been made for the safety of the drinking water sources of Belpre Township from this proposed well and the existing injection well adjacent to it?
11. What is the plan for seismic monitoring of this well and its impact on the geological formations involved (Clinton, Medina, Queenston)? Is there any reference to this issue from the contracting engineer’s geotechnical report? This was not mentioned in the application.
12. Many people in this county believe that the blow out of an old production well under Veto Lake in summer 2021 was related to the massive amounts of brine waste being injected (under pressure) near that site. Is there any report yet on this blow out?
13. Is there any measurement being proposed in this application for radioactivity of the area from brine waste injection, such as with a radioactive tracer?
14. Is there any plan for measuring the impact of this well on air pollution through devices such as VOC (volatile organic compounds) monitors? This is being done in western PA where injection wells are located..
15. We notice that ODNR charges a higher rate for brine waste coming from PA & WV (to be injected in OH wells) than it does for that coming from OH. Does this constitute an usurpation of the federal responsibility for interstate commerce?

George Banziger