I have reviewed the document. Here are my thoughts:

1. I think the Division (Oil & Gas Resources Management) is positioning itself for approving the application from Arrowhead Road Services LLC. The document mentions in several places that if all rules/regulations are met in the application, they are obligated to approve it. This leads to my first question. Why isn't the reaction of the local community, as expressed in a public meeting, part of the permitting process? If it were in this case of Arrowhead Road Services, the application would certainly be denied or delayed.

2. Several of the responses of the Division in this document are mere deflections of responsibility. In response to the question raised at the meeting about air emissions, they write that air emissions are Ohio EPA's responsibility. I have a similar reaction to the one above--why can't the criterion of assurance about air emissions be part of the permitting process? Ohio EPA should sign off on every application when it comes to this criterion of impact on air quality.

3. Same issue when it comes to their response about truck transport of brine waste. They deflect this concern by writing that truck routes and spills on roads are ODOT's responsibility. Again, why isn't this item part of the permitting process? ODOT should sign off on all these applications, especially since so much of this brine waste is being transported by truck.

4. In response to the question about why so much brine waste is coming from other states (PA & WV primarily), the document states that each state's rules on brine waste depend on their "regulatory set up." Why do these two neighboring states have a stricter "regulatory set up" than Ohio does?

5. The pressing question about what brine waste is got an interesting response. The document referred the reader to the Frac Focus database. In that database it is mentioned that 0.5-2% of brine waste is comprised of chemicals (of course, with millions of barrels involved this is not a trivial amount). That database does NOT identify the chemicals in brine waste--merely their function, e.g., "corrosion inhibitor" This is an egregious evasion of fact--chemicals like arsenic, lead are, in fact, the toxic substances in brine waste.

6. There was a question raised at the meeting about the lack of an emergency response plan in the application. The Division's response is that this is not required--all the applicant has to do is identify local first responders. Why isn't such a plan part of the permitting process?

7. The Division has stated numerous times, as they have in this document, that the Division responds to requests for public meetings only from public officials. Where in the regulations that apply to the Division's activities is that mentioned? Why can't a resident of the township or county where the proposed injection well is to be located request a public meeting and ODNR grant such a request?

George Banziger

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