

# ADMINISTRATIVE WATCH

ADDRESSING ENVIRONMENTAL, ENERGY AND NATURAL RESOURCE ISSUES



## Ohio Issues Draft Rules on Oil and Gas Well Site Construction

The Ohio Department of Natural Resources, on February 21, 2014, published draft rules concerning horizontal well site construction. The public comment period for the draft rules ends on March 10, 2014. A subsequent 30-day comment period will be announced after the draft rules are formally proposed. The draft rules are available on the Division of Oil and Gas Resources Management's website, <http://oilandgas.ohiodnr.gov>.

The rules require approval of a well site by the Chief of the Division of Oil and Gas prior to construction of the site. "Well site" is defined as including the well pad, all associated production activities, and access roadways. The rules require submission of an application containing extensive and detailed information, including detailed drawings, a sediment and erosion control plan, a dust control plan, a geotechnical report, and a storm water hydraulic plan.

The rules create an approval process that is not linked to the issuance of well drilling permits, and is therefore a new, independent approval requirement. The rules as drafted present numerous and significant issues regarding establishing the boundaries of a well site and the nature and extent of information needed to obtain approval of the site.

For additional information on the draft rules, and to obtain assistance on submitting comments, please contact David Northrop at 412-394-6590 or [dnorthrop@babstcalland.com](mailto:dnorthrop@babstcalland.com).

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