

Gentlemen,

Thank you for coming in to meet with us regarding Buckeye Brine's two Class I non-hazardous UIC permit applications. The following serves to summarize our meeting.

In discussions with representatives of Buckeye Brine on 5/11/2018, the following was communicated by Ohio EPA concerning the description in the application of the geology of the Rose Run Formation, the location and amount of oil and gas present within the Rose Run Formation, and the assessment of the potential impacts to those oil reserves due to the proposed injection of non-hazardous waste into Class I wells on the Buckeye Brine property:

1. The above descriptions should be addressed within the application as a standalone report.
2. All conclusions need to be clearly supported by data and published references. As an example, many conclusions in the present report reference logs and tests (spinner, injectivity, pressure fall off, etc.) within the application without referencing the location of the applicable data set, logs or tests in the application nor describing how what is recorded on the log or data from the tests supports the stated conclusion. This is also true of references made to USGS reports without any mention of the report(s) title or name.
3. The current status of the Rose Run as an oil producing formation within the AOR should be discussed. This should include the production of the current oil and gas wells within the AOR and an estimate of the oil reserves within the Rose Run in the AOR. Also a discussion of the likelihood of future oil and gas wells being drilled into the Rose Run should be presented.
4. The application indicates that the Rose Run has not and will not accept any fluid from the injection activities at the Buckeye Brine facility. However, no data is presented nor explained to support this statement. The report must present all supporting data and explain how the data confirms the opinion that the Rose Run is not accepting fluid.

Ohio EPA communicated to Buckeye Brine that we are dropping our request to identify lease holders of oil and gas rights in the Rose Run for the area within the AOR and are focusing on the items noted above. Once we receive the information discussed above, we will re-evaluate the applications, as revised, pursuant to ORC 6111.044.

Please let us know if you have any questions.

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